Texas Commission on Environmental Quality

Waste Permits Division Correspondence Cover Sheet

Date: 5/16/2025
Facility Name: Greater El Paso Landfill
Permit or Registration No.: 2284A

Nature of Correspondence:
☐ Initial/New
☒ Response/Revision to TCEQ Tracking No.: 30295149 (from subject line of TCEQ letter regarding initial submission)

Affix this cover sheet to the front of your submission to the Waste Permits Division. Check appropriate box for type of correspondence. Contact WPD at (512) 239-2335 if you have questions regarding this form.

Table 1 - Municipal Solid Waste Correspondence

Applications	Reports and Notifications
☐ New Notice of Intent	☐ Alternative Daily Cover Report
☐ Notice of Intent Revision	☐ Closure Report
☐ New Permit (including Subchapter T)	☐ Compost Report
☐ New Registration (including Subchapter T)	☐ Groundwater Alternate Source Demonstration
☒ Major Amendment	☐ Groundwater Corrective Action
☐ Minor Amendment	☐ Groundwater Monitoring Report
☐ Limited Scope Major Amendment	☐ Groundwater Background Evaluation
☐ Notice Modification	☐ Landfill Gas Corrective Action
☐ Non-Notice Modification	☐ Landfill Gas Monitoring
☐ Transfer/Name Change Modification	☐ Liner Evaluation Report
☐ Temporary Authorization	☐ Soil Boring Plan
☐ Voluntary Revocation	☐ Special Waste Request
☐ Subchapter T Disturbance Non-Enclosed Structure	☐ Other:
☐ Other:	

Table 2 - Industrial & Hazardous Waste Correspondence

Applications	Reports and Responses
☐ New	☐ Annual/Biennial Site Activity Report
☐ Renewal	☐ CPT Plan/Result
☐ Post-Closure Order	☐ Closure Certification/Report
☐ Major Amendment	☐ Construction Certification/Report
☐ Minor Amendment	☐ CPT Plan/Result
☐ CCR Registration	☐ Extension Request
☐ CCR Registration Major Amendment	☐ Groundwater Monitoring Report
☐ CCR Registration Minor Amendment	☐ Interim Status Change
☐ Class 3 Modification	☐ Interim Status Closure Plan
☐ Class 2 Modification	☐ Soil Core Monitoring Report
☐ Class 1 ED Modification	☐ Treatability Study
☐ Class 1 Modification	☐ Trial Burn Plan/Result
☐ Endorsement	☐ Unsaturated Zone Monitoring Report
☐ Temporary Authorization	☐ Waste Minimization Report
☐ Voluntary Revocation	☐ Other:
☐ 335.6 Notification	
☐ Other:	

May 16, 2025

Ms. Arin Anderson
Project Manager
Texas Commission on Environmental Quality
12100 Park 35 Circle
Austin, TX 78753

RE: Response to First Technical Notice of Deficiency (TCEQ Tracking No. 30295149)
Greater El Paso Landfill (Type I)
Major Amendment Permit Application
TCEQ Permit Number MSW 2284A
El Paso County, Texas

Dear Ms. Anderson,

On behalf of the City of El Paso, Texas, Burns & McDonnell Engineering Company, Inc. is submitting the enclosed response to the first technical Notice of Deficiency (NOD) provided via email on February 20, 2025 from the Texas Commission on Environmental Quality (TCEQ) for the Greater El Paso Landfill, MSW 2284A (Landfill) major amendment permit application. This major amendment is focused on the vertical expansion of the existing Landfill. The permit application has been revised to address the NOD comments. The NOD comments and associated responses are provided in the following NOD table. Revised sections and appendices are included as an attachment to this letter and are identified as to the appropriate replacement location in the existing application.

Enclosed is one (1) original copy and two (2) unmarked copies of the pages that were revised to address the NOD. In addition, one redline/strikeout copy of the revised pages is also attached. An additional one (1) unmarked copy will be mailed directly to the TCEQ Region 6 Office.

We appreciate your review of the enclosed materials and look forward to your comments. If you need additional clarification on anything presented in this NOD response, please do not hesitate to contact me directly to discuss your questions or concerns.

Sincerely,

Tonya Koller, PE
Project Manager
952-656-3615
[redacted]

Enclosure

cc: Nicholas Ybarra, City of El Paso

NOD ID	NOD Description	Formal Response
1	Waste storage areas, as defined in 330.3(157), are not discussed in the application and are not included in any of the facility figures. Show the storage area(s) on the application figures and describe the types of storage taking place at the facility. If storage areas could potentially move location in the future, include provisions for how those changes will be handled and documented.	The storage areas in Sections 14 and 15 of the Part I form refer to the leachate evaporation ponds, which are shown on Figure III.C.1 in Part III, Appendix III.C. The leachate evaporation ponds are discussed in Part III, Appendix III.C, Section III.C.2.2.5. The leachate evaporation ponds will not be moved in the future.
2	The City of El Paso has elected a new mayor since the most recent application submittal. Update the Mayor Information section to indicate that Renard Johnson is the current mayor.	Section 20 of the Part I form has been revised to reflect Renard Johnson as the mayor of the City of El Paso.
3	The local government authority responsible for road maintenance, as indicated in the existing permit and in the submitted TCEQ-20719 form Section IV, is El Paso County. Review and revise the form(s) and/or application areas as appropriate to reflect the responsible road authority.	Section 20 of the Part I form has been revised to reflect the appropriate Local Government Authority Responsible for Road Maintenance.
4	The International Boundary and Water Commission (IBWC) is the River Basin Authority for the area that the facility is located in. Review and revise the form as appropriate to reflect the responsible authority.	Section 20 of the Part I form has been revised to reflect the International Boundary and Water Commission as the River Basin Authority.
5	Correct the attachment number provided in the table for the Supplementary Technical Report from Appendix I/II.K to Appendix I/II.J.	The attachment number in Table 1 of the Part I form has been revised to reflect the Supplementary Technical Report as Appendix I/II.J.
6	a) The wind rose is illegible or difficult to interpret in the provided figure. Increase the size of the wind rose on the current figure or provide a larger version of the wind rose as a separate page. b) The USGS 7.5-minute map is illegible or difficult to interpret. Provide an 11 by 17-inch page of the USGS 7.5- minute map.	The wind rose on Figure I/II.A.5 has been moved to a separate page, and is now Figure I/II.A.5.b in Appendix I/II.A. Figure I/II.A.6 in Appendix I/II.A has been reformatted to an 11 by 17-inch page.
7	Include the required acknowledgements regarding air pollution control and water pollution control in the application.	Part IV, Section IV.14.0 has been revised to acknowledge the requirements of 30 TAC §330, Subchapter U. Part III, Section III.2.3 has been revised to acknowledge the requirements of 30 TAC §330.55(b).
8	The latitude and longitude reported on Part I Form page 5 should be that of the benchmark. The benchmark elevation and coordinate information found on page I/II-52 and page I/II-55 are inconsistent. Revise these pages for consistency.	Section 12 in the Part I form as well as Figure I/II.B.2 in Appendix I/II.B have been revised to include the benchmark coordinate information as identified in the letter from Brock & Bustillos Inc. in Part I/II, Appendix I/II.B.
9	TCEQ forms may not function as a mechanism for establishing signatory authority. Provide proof of signatory authority in accordance with 305.44(a)(3).	Proof of signatory authority has been provided after the Part I form, on Page I/II-15a.
10	The existing permit indicates that a Hazardous Waste Management permit is applicable. Confirm if such a permit is required for the facility.	As stated in the Part I Form, Section 11, a hazardous waste management permit is not required for the facility.
11	The estimate provided uses years 2024-2027 and does not show the trend. Provide projected estimates spanning at least five consecutive years and data indicating initial acceptance rates increasing to an estimated maximum tons per day over the next five years.	Table 1 in Section F of Appendix I/II.C has been revised to reflect estimated tonnage from 2025-2029 based an anticipated waste tonnage increase of 2.0 percent per year based on the average annual growth over the past 5 years.
12	Provide statistical data to support that growth trends are expected to be minimal, e.g., projected total population or percentage change based on Census Bureau data.	Section IX has been revised to state that according to the U.S. Census Bureau data, the average annual population growth rate in El Paso County from 2020 to 2024 is 0.28%. Population growth is expected to remain minimal.
13	a) Provide the Estimated Site Life in TCEQ-20719 Form Section V.3.c. b) Ensure TCEQ-20719 Form is updated once a response is received from TxDOT and FAA. c) Provide an explanation why information in Tables 4 and 5 regarding existing and expected traffic generated by the facility on each roadway and Table 6 regarding major (signalized) roadway intersections within one mile of the facility was marked non-applicable on the TCEQ-20719 Form. This information is applicable to the facility. Review and revise the form as appropriate.	a) The estimated site life has been added to Section V.3.c of Form TCEQ-20719 in Appendix I/II.G. b) Section XI.1.b of Form TCEQ-20719 in Appendix I/II.G has been revised to reflect that a response from FAA was received on December 2, 2024 and provided to the TCEQ with the Admin NOD Response on December 17, 2024. Section II of Form TCEQ-20719 in Appendix I/II.G has been revised to reflect that a response has been received from TxDOT. Correspondence from TxDOT has been included in Appendix I/II.G. c) Table 6 in Form TCEQ-20719 was marked as non-applicable because the distance from the intersection of Darrington Road and Frontage Road to the Facility is greater than one mile.
14	The maximum waste elevation and final cover elevation are inconsistent with Drawing III.A.10. Revise the drawings for consistency.	Drawing I/II.B.5 in Appendix I/II.B has been revised to accurately reflect the maximum final cover and waste elevations.
15	Provide schematic view drawings, as applicable, for each type of wastes received at the facility.	A schematic drawing is provided as Drawing III.A.3 in Part III, Appendix III.A. Waste enters the GEP Landfill from the public access road and is evaluated at the scale house. If accepted, MSW disposal occurs at the working face. Large items are managed at the public drop off area in accordance with Part IV, Section IV.13.0.
16	Provide ventilation and odor controls measures, including their design details, in the site development plan.	Part III, Section III.2.2 has been revised to state that landfill gas design details related to ventilation and odor control measures are discussed in Appendix III.H.
17	Revise the surface water drainage report to comply with the Surface Water Drainage and Erosional Stability Guidelines for a Municipal Solid Waste Landfill, RG-417 (https://www.tceq.texas.gov/downloads/permitting/waste- permits/publications/rg-417.pdf).	Part III, Appendix III.B has been revised to be in compliance with the Surface Water Drainage and Erosional Stability Guidelines for a Municipal Solid Waste Landfill, RG-417.

NOD ID	NOD Description	Formal Response
18	a) Provide comparison between pre-developed and post- developed conditions for discharge rate, volume, and velocity for each discharge point (A, B, C, D, and E) in a tabular form. b) Revise calculations considering the currently permitted conditions as a pre-development condition for drainage calculations (see RG-417).	Part III, Appendix III.B.4.0 has been revised to include a table for pre- and post-development comparisons. Pre-development conditions were revised to reflect currently permitted conditions.
19	Provide designs, including cross sections and calculations, for the run-on control system to prevent a 24-hour, 25-year storm run-on to active face.	Part III, Appendix III.B.3.5 has been revised to discuss active face run-on and run-off management. Calculations are provided in Part III, Appendix III.B, Attachment III.B.1.
20	Provide designs, including cross sections and calculations, for run-off management system at the active face for a 24- hour, 25-year storm event.	Part III, Appendix III.B.3.5 has been revised to discuss active face run-on and run-off management. Calculations are provided in Part III, Appendix III.B, Attachment III.B.1.
21	Revise soil loss calculations to ensure that the calculated soil loss does not exceed the soil loss quantity, as specified in RG-417.	Soil Loss conditions and calculations were revised to comply with RG-417 in Part III, Appendix III.B, Attachment III.B.2 - Erosion and Sediment Control Plan.
22	Provide details of calculations for the estimated peak velocities for top surfaces and external embankment slopes.	Part III, Appendix III.B, Table III.B.3-2 has been revised to include calculation for the peak velocities of top surfaces and embankment slopes.
23	Provide details of calculations for non-erodible velocities, as indicated in Table II.B.2.4-1.	Part III, Appendix III.B, Attachment III.B.2 - Erosion and Sediment Control Plan was revised to include discussion, reasoning, and calculations for non-erodible velocities. Calculations provided in Attachment III.B.1.
24	Provide details of calculations for sizing and grading of drainage features, ensuring to prevent erosion, and a long term, low maintenance geotechnical stability to the final cover.	Details for calculations for sizing and grading of drainage controls are provided in Part III, Appendix III.B and Part III, Appendix III.B, Attachment III.B.1. Slope stability calculations are provided in Part III, Appendix III.G.
25	Provide maintenance and repair procedures in the surface water drainage report for the drainage systems/structures.	As discussed in Part III, Appendix III.B.3.4, maintenance of drainage appurtenances is the responsibility of the landfill manager. Inspection and maintenance requirements are provided in Table III.B.2.3-5 in Attachment III.B.2 and Part IV, Table IV.3-3.
26	Provide design calculations and specifications for interim erosion control structures, including for intermediate cover.	Part III, Appendix III.B has been revised to include calculations (Attachment III.B.1) and specifications (Attachment III.B.2) for erosion control structures.
27	Update the evaporation ponds design calculations to reflect 25-year, 24-hour rainfall design storm per NOAA Atlas-14.	The evaporation pond calculations were calculated based on utilizing actual average and maximum actual rainfall for the year versus utilizing a single rain event data point (i.e., 25-year, 24-hour). At the time of the calculation, data from the prior 25 years (1980-2004) was used to determine the average annual rainfall (11.77-inches) and the maximum rainfall (19.41 inches). Historic rainfall data was taken from Station USW00023044 at the El Paso International Airport for the previous 30-years (1994 to 2024) to determine an average annual rainfall of 8.4-inches and maximum rainfall of 17.51-inches. Therefore, based on the above historic rainfall comparison as well as the evaporation ponds appear to have been constructed larger than design, the existing evaporation calculations are considered conservative.
28	Provide drainage area drawing and drainage calculations for the pre-development conditions (see RG-417).	Pre-development conditions were revised as currently permitted conditions. Drawings and calculations for these conditions have been included in this revision.
29	Provide cross-sections including calculations for drainage structural designs (e.g., downchutes, berms, channels, etc.).	Cross-sections and calculations for drainage controls have been included in Part III, Appendix III.B, Attachment III.B.1.
30	Provide calculations to verify that the permitted drainage patterns will not be adversely altered around each discharge point.	Part III, Appendix III.B.4.0 has been revised to include a table (Table III.B.4-1) and discussion for pre- and post-development comparisons.
31	Provide calculations for sizing downchutes, interceptors, side slope berms, top slope berms, perimeter ditches, detention facilities, and culverts, as indicated in the Appendix IIIB narrative and figures.	Cross-sections and calculations for drainage controls have been included in Part III, Appendix III.B, Attachment III.B.1.
32	Revise drainage discussion and analyses to explain that the permitted/existing stormwater peak flow, velocity and volume of discharge will not exceed on any discharge points as a result of the proposed landfill expansion.	Part III, Appendix III.B.4.0 has been revised to include a table (Table III.B.4-1) and discussion for pre- and post-development comparisons.
33	Submit calculations for structural design, including cross sections, for drainage structures and storage facilities.	Cross-sections and calculations for drainage controls have been included in Part III, Appendix III.B, Attachment III.B.1.
34	Provide the source of all data for flood plain determination and include the drawing in the surface water drainage report showing boundaries of the proposed landfill facility on the floodplain map.	Figure I/II.A.11 in Part I/II, Appendix I/II.A displays a FEMA Flood Service Map, FIRM Panel 48141C0660F. This figure shows the site is not within the 100-year floodplain.
35	Indicate freeboards on the drawings (as applicable), and ensure that the design of ponds and other drainage structures maintain a minimum freeboard to prevent overtopping from a 25-year, 24-hour rainfall event.	Freeboard depths, as calculated by HEC-HMS, have been provided in Part III, Appendix III.B, Drawings III.B.11-14.
36	Provide details of all-weather interior access road locations and the type of surfacing with cross sections, including control measures to minimize the tracking of mud onto the public roads.	Landfill access road locations are shown on Part III, Appendix III.A, Drawing III.A.3 and road details are provided on Drawing III.B.6 in Part III, Attachment III.B. Mud tracking control measures are included in Part IV, Section 16.0.
37	Provide sufficient legend information and labels, as applicable to the title of each drawing. Ensure that the legend information and labels are provided consistent with the title of the drawing.	Legend information and labels have been added to Part III, Appendix A.III, Drawings III.A.13 through III.A.21.
38	Provide cross-sections with inset key maps showing gas probes and groundwater monitoring wells.	Groundwater monitoring wells and gas monitoring probes have been added to cross sections on Drawing III.A.13 through III.A.21. Boring elevations tables have been added for wells and probes.

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39	Provide construction and design details of compacted perimeter or toe berms that are proposed in conjunction with aboveground (aerial-fill) waste disposal areas.	Detail 3 on Drawing III.B.5 in Part III, Appendix III.B, Attachment III.B.3 has been modified to include conditions for vertical expansion, for which the pre-expansion diversion berm is converted to a toe-berm. Cell perimeter toe berms are depicted in Detail 5 on Drawing III.C.3 in Part III, Appendix III.C, Attachment III.C.1.
40	Revise HELP modeling input and output considering the revised water balance cover (See RG-494). You may find RG-494 at: https://www.tceq.texas.gov/downloads/permitting/waste- permits/publications/rg-494.pdf	The water balance cover has not been revised (see response to NOD ID 65(a)). As a result, the HELP modeling inputs and outputs have not been revised.
41	Include documentation that the hydrogeologic characteristics were considered in accordance with NOAA Atlas-14 for rainfall design storm.	Climatological data in Appendix III.C, including average annual precipitation, were synthetically generated by the HELP Model based on the latitude and longitude of the landfill. Additional information is provided in Part III, Appendix III.C, Attachment III.C.3, Section III.C.3.2.1. Regional hydrogeology is not anticipated to be affected by the ATLAS 14 rainfall intesity maps. The Liner Quality Control Plan (LCQP) in Part III, Appendix III.D will not have a direct impact from the rainfall design storm from NOAA Atlas-14.
42	Provide a written discussion of the consideration of local groundwater use when designing the groundwater monitoring system. If the lack of groundwater use as drinking water was a factor then include this in the discussion.	Part III, Appendix III.C, Section III.C.1.0 and Part III, Appendix III.D, Section III.D.5.2 have been revised to state that a discussion of the consideration of local groundwater use is provided in Part III, Appendix III.E, Section III.E.5.0. Updated Appendix III.E.5.0, Section III.E.5.4 to include additional detail regarding drinking water use in the area. Groundwater in this area is not anticipated to be used as drinking water.
43	Discuss the tests and specifications for the drainage materials and pipes for providing chemically resistant materials for leachate collection and removal systems.	HDPE pipe is specified for the leachate collection piping as identified in Part III, Appendix III.C, Section III.C.2.2.2. The Chemical Resistance of Plastic Piping Materials technical report from the Plastics Pipe Institute has been included as Attachment III.C.7 of Appendix III.C in Part III that provides chemical resistance data of HDPE piping.
44	Delete Attachment III.C.4 - Pipe Strength Calculations, provided for "Crow Wing County Permit Renewal." Provide calculations for the site-specific leachate collection and associated leachate removal systems with sufficient strength and thickness to prevent collapse.	The calculations in Part III, Attachment III.C.4 were developed for the site-specific leachate collection and associated leachate removal system. The header in Part III, Appendix III.C, Attachment III.C.4 has been revised to "Greater El Paso Landfill Major Permit Amendment" to accurately reflect this.
45	Indicate in the permit application that the seasonal high groundwater table will be updated as new seasonal high levels are measured or indicate where in the application this requirement is addressed.	Part III, Appendix III.E, Section III.E.6.6, has been revised to state that groundwater measurements will be updated with subsequent monitoring events. Note 2 of Part III, Appendix III.A, Drawings III.A.13 through III.A.21 has been updated to indicate that the seasonal high groundwater (as of the date of the original application) is in Part III, Attachment III.E.21.
46	Provide a statement that all liner evaluation reports will be prepared in accordance with the approved LQCP or indicate where in the application this information is addressed.	Part III, Section III.4.2.9 states Geosynthetic Clay Liner Evaluation Reports (GCLERs) and Geomembrane Liner Evaluation Reports (GLERs) shall be prepared in accordance with Part III, Appendix III.D, the Soil Liner Quality Control Plan.
47	Provide relevant groundwater monitoring data to help characterize the quality of groundwater in the area of the landfill units. If this information is currently in the application, provide a more specific location than Appendix III.E.	Updated Appendix III.E.6.6. on pages E-12 & E-13 to include details on semi-annual monitoring program. Included discussion of the results from the most recent groundwater sampling events (2023 & 2024) and included the most recent groundwater monitoring reports as Attachment III.E.29. All wells are currently in the detection monitoring program and assessment monitoring is not required, indicating that landfill operations are not impacting groundwater.
48	Indicate the location where information about how changes to the detection monitoring program will be addressed is found. i.e., the submittal of a permit amendment or modification within 90 days or include a statement requiring 90-day action for a breakdown in the permitted monitoring system such as a damaged well.	Part III, Appendix III.F, Section F.7.0 - Reporting Requirements, Page III.F-21 has been revised to address the requirements of changes to the detection monitoring program as outlined in 30 TAC §330.407(d). Indicated that any amendments or modifications, such as repair of damaged wells or replacement of an existing well, a change in sampling frequency, or proposed installation of additional wells will also be conducted in accordance with the permitting requirements outlined in 330.73, 305.62, and 305.70.
49	Provide written justification for the termination points of the point of compliance for both the northern perimeter and the southern perimeter of the landfill units. The description of groundwater flow in the area of the facility states that groundwater flow can be to the northeast, east and southeast.	Provided history, description, and classification (background, point of compliance, or observation) in III.F.5.6.2 - Groundwater Monitoring System.
50	a) Provide a list of point of compliance wells, background (upgradient) wells and any observation wells. b) The position of well MW-1 is positioned centrally between two landfill units and is noted as downgradient in the application text. Explain whether MW-1 will be treated as a point of compliance well or an observation well.	Updated Appendix III. Added Section III.F.5.6.2 - Groundwater Monitoring System. MW-1 was originally installed to serve as a point of compliance well for the Phase I portion of the landfill. After installation of MW-9 prior to placement of waste in Cell 7 and installation of wells 10 & 11 to serve as additional point of compliance wells for the Phase II portion of the landfill, MW-1 is now used as an observation well.

NOD ID	NOD Description	Formal Response
51	Provide written justification for the distance between MW-8 and MW-9 which appears to be approximately 1,100 feet. Include discussion of pipeline and powerline easements traversing the landfill units if this is the justification for not meeting the 600 ft spacing requirement.	Updated Appendix III. Added Section III.F.5.6.2 - Groundwater Monitoring System. The distance between MW-8 and PB-37 is addressed on page F-17. MW-8 was installed in 2009, with a planned spacing between wells of 600 feet, in accordance with 30 TAC §330.403(a)(2). However, later field verification revealed that there was an error in the installation drawing and PB-37 is located 642-feet away from MW-8. An Alternate Well Spacing Demonstration was submitted to TCEQ in 2010 and approved by TCEQ on October 26, 2010.
52	Provide a groundwater monitoring system design certified by a qualified groundwater scientist. If a certification was previously provided, resubmit with this application or provide a new certification. The applicant checklist refers to appendix III.F but the certification was not found in the application.	Certification of the groundwater monitoring system has been included as Attachment III.F.7 of Part III, Appendix III.F. Certification includes the 2009 groundwater monitoring system and certifications following the installation of MW-14 & 15 in 2015 and MW-10 & 11 in 2019.
53	Provide an acknowledgement statement addressing this notification requirement. If this information is in the application, indicate the specific location where this information is provided.	Part III, Appendix III.F, Page III.F-1 has been revised to address the requirements of an acknowledgement statement as outlined in 30 TAC §330.403(e)(3).
54	Address the testing requirement or provide the specific location where this information can be found.	Part III, Appendix III.F.6.0 - Statistical Analysis for Detection Monitoring has been added to address the requirements of 30 TAC §330.405(f)(2). Additional detail regarding accepted statistical methods as outlined in 30 TAC §330.405(e)(1-5) was also added for clarification. Additionally indicated that any statistical method comply with the performance standards outlined in 30 TAC §330.405(f)(1-6).
55	The GWSAP and/or statistical analysis plan should be a standalone document that covers all aspects of detection and assessment monitoring even if a facility has not had to implement an assessment monitoring program. Ensure that the GWSAP and/or statistical analysis plan addresses each individual rule requirement as outlined in 330.409.	Part III, Appendix III.F.5.5 and III.F.6.0 have been revised to address the requirements of 30 TAC §330.409(a).
56	Revise the GWSAP to make direct reference to the full set of 40 CFR Part 258, Appendix II constituents required under an assessment monitoring program.	Part III, Appendix III.F.5.5 - Constituents to be Analyzed and Test Methods, Page III.F-13 has been revised to address the requirements of 30 TAC §330.409(b).
57	Revise the GWSAP to include the requirements to sample background wells for any new Appendix II constituent detected at the point of compliance during implementation of an assessment monitoring program.	Part III, Appendix III.F.5.5 - Constituents to be Analyzed and Test Methods and Appendix III.F.5.6 - Establishment and Updating of Background Data, Pages III.F-13 and III.F-15, respectively, have been revised to address the requirements of 30 TAC §330.409(b).
58	Revise the GWSAP to address the option of a subset of Appendix II constituents once assessment monitoring is initiated.	Part III, Appendix III.F.5.5 - Constituents to be Analyzed and Test Methods, Page III.F-13 & 14 have been revised to address the requirements of 30 TAC §330.409(b).
59	Revise the GWSAP for the option of having, or being required to perform, an alternate frequency for sampling Appendix II constituents.	Part III, Appendix III.F.5.5 - Constituents to be Analyzed and Test Methods, Page III.F-14 has been revised to address the requirements of 30 TAC §330.409(b).
60	Revise the GWSAP to specify that during assessment monitoring, Appendix II constituents detected may be added to Appendix I constituents and must be sampled at least once in background wells.	Part III, Appendix III.F.5.5 - Constituents to be Analyzed and Test Methods, Page III.F-14 has been revised to address the requirements of 30 TAC §330.409(b).
61	Include a discussion of establishment of background for any additional Appendix II constituents detected and establishment of groundwater protection standards for all constituents detected in point of compliance wells as outlined in 330.409(d)(2) and (3).	Part III, Appendix III.F.5.5 - Constituents to be Analyzed and Test Methods, Page III.F-14 has been revised to address the requirements of 30 TAC §330.409(d)(2)-(3).
62	Include the procedures described in 330.409(e) and (f) for actions based on the comparison of Appendix II concentrations to background. Include the condition for two consecutive sampling events prior to returning to detection monitoring.	Part III, Appendix III.F.5.5 - Constituents to be Analyzed and Test Methods, Page III.F-14 has been revised to address the requirements of 30 TAC §330.409(e)-(f).
63	Revise the GWSAP to address all of the requirements under 330.409(g) which includes actions taken if Appendix II constituent concentrations are at statistically significant levels above the groundwater protection standards. Include evaluation of the nature and extent of the release, installation of additional point of compliance wells, continued sampling, and implementation of corrective action and reporting.	Part III, Appendix III.F.5.5 - Constituents to be Analyzed and Test Methods, Page III.F-14 has been revised to address the requirements of 30 TAC §330.409(g).
64	Revise the GWSAP to include the three methods for establishing a groundwater protection standard for Appendix II constituents detected during assessment monitoring and required by 330.409(h)(1)-(3).	Part III, Appendix III.F.5.5 - Constituents to be Analyzed and Test Methods, Page III.F-14 has been revised to address the requirements of 30 TAC §330.409(h).
65	a) Update the alternative final cover design per RG-494: Guidance for Requesting a Water Balance (WB) Alternative Final Cover Design for a Municipal Solid Waste Landfill. b) Provide slope stability and settlement analysis consistent with the revised final cover design. c) Ensure that a final cover system consists of not less than two feet of soil cover. d) Provide an erosion layer that consists of at least six inches of soil capable of sustaining native plant growth and that will be seeded or sodded immediately following the application of the final cover.	a) Please see the added memorandum in Part III, Appendix III.I, Attachment III.I.1. b) The slope stability and settlement analyses provided in Part III, Appendix III.I, Attachment III.I.1 and Part III, Appendix III.G are consistent with the alternative final cover design. c) As described in Part III, Appendix III.I, Attachment III.I.1, Page III.I-30, the alternative final cover system consists of an 4-inches of rock armoring (erosion control layer), 18-inch infiltration layer, and 6-inch base layer. The infiltration and base layer provide the required 2-feet of soil cover. d) As identified in the alternative final cover system, a rock armoring layer will be placed as the final layer to provide erosion protection. An Equivalent Erosion Protection has been provided in Part III, Appendix III.I, Attachment III.I.1, Page III.I-32. High temperatures and low rainfall in the El Paso area make sustaining vegetative growth without irrigation extremely difficult. Therefore, the alternative final cover has been designed with no vegetative cover. The rock armor will provide more consistent, year-round erosion control.

NOD ID	NOD Description	Formal Response
66	Demonstrate that the revised alternative final cover will achieve equivalent reduction in infiltration.	As discussed in Part III, Appendix III.I, Attachment III.I.1, Page III.I-48, the alternative final cover design provides equivalent reduction in infiltration as the clay-rich soil cover layer specified in 30 TAC §330.457(a)(1) or (2).
67	Demonstrate that the revised alternative final cover will provide equivalent wind and water erosion protection.	As discussed in Part III, Appendix III.I, Attachment III.I.1, Page III.I-48, the alternative final cover design provides equivalent protection from wind and water erosion as the erosion layer specified in subsection 30 TAC §330.457(a)(3).
68	Revise the closure plan to be consistent with a revised alternative final cover design.	The alternative final cover design has not been revised (see response to NOD ID 65(a)). As a result, the closure plan has not been revised.
69	Explain if the total area to be closed in the future includes the part of Phase-1 proposed for the vertical expansion.	Table 8 in Part III, Appendix III.I has been revised to reflect the largest open area in Phase 2 and the largest open area in Phase 1 for the vertical expansion. Waste filling in the Phase I expansion area will not begin until waste filling in Phase 2 is complete.
70	Provide a final contour map in the closure plan, depicting all surface drainage features (e.g., berms, downchutes, channels, ponds, etc.) on the map.	A final contour map depicting all surface drainage features (including berms, downchutes, channels, and ponds) is shown on Drawing III.B.4 in Part III, Appendix III.B, Attachment III.B.3.
71	Provide post-closure care plan, including for Phase I, and revise Tables #1 and #2, as appropriate.	The Post Closure Plan included as Part III, Appendix III.J includes the existing closed Phase I, as well as the future closure of the Phase I vertical expansion. The overall area of Phase I remains the same. The existing closed Phase I is in post-closure care currently. The existing final cover will be removed (and therefore that portion of the final cover will be removed from post-closure care) prior to waste being placed in the vertical expansion area (34.6 acres). The vertical expansion portion of Phase I will re-enter post-closure care after the waste filling is completed and closure is certified. Table 2 in Part III, Appendix III.J, has been revised to clarify the intent.
72	Provide closure cost estimates for a conventional composite final cover system (see Section 2.2/ TCEQ-20721) for hiring a third party to close the areas that have not received final cover. Note, in the event of a forced closure, the groundwater and landfill gas monitoring systems, and leachate management systems may not have been completed, thus, costs to complete these systems must be provided.	A conventional final cover system is not being proposed for this site. The Closure Cost Estimate previously provided in Part III, Appendix III.K was developed in accordance with the alternative final cover system and costs associated with closure are for the entirety of Phase 2 (122.5 acres), even though the largest open areas are calculated at 55.2 acres for Phase 2 and 34.6 acres for the expansion area of Phase 1. Groundwater and landfill gas monitoring systems as well as leachate management systems are already installed for the open portions of the landfill. When future cells are constructed (i.e., increasing the open area), these systems will be expanded at the time of construction; therefore, there will be no costs associated with the closure, even if forced, of these cells.
73	Provide details for a partial post-closure care plan for the Phase I area to be implemented, as indicated in the application.	Previously provided Part III, Appendix III.L post-closure cost estimates include both Phase 1 and Phase 2 (216.4 acres of total waste footprint). The vertical expansion of Phase 1 does not increase the acreage for post-closure care.
74	Include required acknowledgement in the application.	Part IV, Section IV.1.0, has been revised to address the requirements of 30 TAC §330.121(a).
75	Include that the facility will provide the reports required by 30 TAC 330.675 to the executive director.	Part IV, Section IV.2.0 has been revised to state that reports required by 30 TAC §330.675 will be provided to the executive director.
76	Revise the text to reference the correct provision for increased waste acceptance rate modifications under Chapter 305 i.e. 305.70(l).	Part IV, Section IV.2.0 has been revised to reference 30 TAC §305.70(l) regarding increased waste acceptance rate modifications.
77	Calculations estimate 76 minutes would be needed to cover the working face. Provide a plan so that any waste not already covered with six inches of earthen material will be covered within one hour of detecting a fire.	The calculations in Part IV, Section IV.4.3.1, Table IV.4-1 have been revised such that waste will be covered with six inches of earthen material within one hour of detecting a fire.
78	Table IV.3-2 does not appear to support the number of haul trucks used in example calculations. Explain this discrepancy and/or revise the application as appropriate.	Table IV.3-2 has been revised to align with the number of haul trucks used in the calculations in Section IV.4.3.1.
79	Address if there are or are not any other activities requiring fire protection measures.	Sections IV.4.6 and IV.4.7 have been added to Part IV and discuss procedures in the event of a vehicle or equipment fire, or structure fire, respectively. The fire protection measures discussed in Part IV, Section IV.4.0 include measures to be taking in the event of a fire at the Landfill working face.
80	Include language that in addition to TCEQ, notification will be provided to any local pollution agency with jurisdiction that has requested to be notified of an access control breach.	Part IV, Section IV.5.2, Table IV.5-1 has been revised to address 30 TAC §330.131 regarding notification to any local pollution agency with jurisdiction that has requested to be notified.
81	Specify the maximum size of each commercial haulers and residential haulers unloading areas.	Part IV, Section IV.6.0 has been revised to identify that only one unloading area is operated and clarify the size of the unloading area and working face.
82	Explain what is considered to be a practical timeframe for the task outlined in the last paragraph of page IV-21.	Part IV, Section IV.6.0 has been revised to include a timeline associated with managing unauthorized waste disposal.
83	Include a statement that the benchmark visibility will be maintained.	Part IV, Section IV.11.0 has been revised to state that benchmark visibility will be maintained.
84	Clarify if the facility will designate an area for large items to be salvaged. If the facility does not currently have an area designated but will potentially in the future, include rationale for when one would be established and describe how the process of establishing and documenting the area will be handled.	Part IV, Section IV.13.0 has been revised to state that the facility will accept large items to be salvaged at the public drop off area. The facility does not have plans to establish an additional area to accept large items.

NOD ID	NOD Description	Formal Response
85	Include a description of roads within the facility.	Section IV.16.0 of Part IV has been revised to include descriptions of perimeter access roads and cell access roads, as well as references to details of facility roads within the application.
86	Indicate that use of alternative daily cover is limited to a 24- hour period after which either waste or daily cover must be placed.	Part IV, Section IV.22.3.3 has been revised to state that the use of alternative daily cover will be limited to a 24-hour period, after which either waste or daily cover will be placed.
87	Provide chemical analysis of the material and/or the Material Safety Data Sheet(s) for the alternative material that was previously approved.	The material data safety sheet for Posi-Shell has been included as Appendix IV.A in Part IV.
88	Include the required acknowledgements in the application.	Part IV, Section IV.22.3.5 has been added and includes the required acknowledgements in 30 TAC, 330.165(d)(5)-(6).
89*	Provide explanation or justification as to why landfill waste acceptance hours are outside of the timeframe specified in §330.135(a).	As stated in Part IV, Section IV.7.0, the waste acceptance hours are 7:00 a.m. to 4:00 p.m. Monday through Saturday. Section IV.7.0 has been revised to explain the landfill is open on Saturday to better accommodate the high volume of incoming traffic at the facility.
90**	Include updated correspondence with the Texas Parks and Wildlife Department.	The correspondence letter and response from the United States Fish and Wildlife Service are provided in Appendix I/II.H. A correspondence letter has been sent to the Texas Parks and Wildlife Department and is provided in Appendix I/II.H.

* Communication from Arin Anderson at TCEQ on 4/11/2025

** Communication from Arin Anderson at TCEQ on 4/28/2025

MSW AUTH NO. 2284A

PART I/II –EXISTING CONDITIONS SUMMARY AND SUPPLEMENTARY TECHNICAL REPORT

CITY OF EL PASO, TEXAS
GREATER EL PASO LANDFILL MAJOR AMENDMENT
PROJECT NO. 155488

REVISION 3, MAY 16, 2025

Landfill Permit Amendment
Part I/II – Existing Conditions Summary and Supplementary Technical Report
MSW Auth No. 2284A

prepared for

City of El Paso, Texas
Greater El Paso Landfill Major Amendment
El Paso County, Texas

Project No. 155488

Revision 0, October 31, 2024
Revision 1, November 26, 2024
Revision 2, December 17, 2024
Revision 3, May 16, 2025

prepared by

Burns & McDonnell Engineering Company, Inc.
6200 Bridge Point Pkwy, Building 4, Suite 400, Austin, TX 78730
Texas Firm Registration No. F-845

CONTENTS

Please replace the Part I Form with the following pages

Texas Commission on Environmental Quality

Part I Application Form for New Permit, Permit Amendment, or Registration for a Municipal Solid Waste Facility

Instructions for completing this Part I Application Form are provided in TCEQ 00650-instr[1]. Include a Core Data Form (TCEQ 10400)[2] with the application for the facility owner, and Core Data Forms for the operator and property owner if different from the facility owner. If you have questions, contact the Municipal Solid Waste (MSW) Permits Section by email to [redacted] or by phone at 512-239-2335. Rules cited on this form are in Title 30 Texas Administrative Code (30 TAC) and may be viewed online at www.tceq.texas.gov/goto/view-30tac.

Application Tracking Information

Facility Regulated Entity Name[3]:
GREATER EL PASO LANDFILL

Site Operator (Permittee or Registrant Name)[4]:
CITY OF EL PASO

MSW Authorization Number: 2284A

Initial Submission Date: 10/31/2024

Revision Date: 5/16/2025

Application Data

1. Submission Type

☐ Initial Submission ☒ Notice of Deficiency (NOD) Response

2. Authorization Type

☒ Permit ☐ Registration

3. Application Type

☐ New Permit

☒ Permit Major Amendment ☐ Permit Limited Scope Major Amendment

☐ New Registration

[1] www.tceq.texas.gov/downloads/permitting/waste-permits/msw/forms/00650-instr.pdf
[2] www.tceq.texas.gov/goto/coredata
[3] Facility Regulated Entity Name must match the Regulated Entity Name indicated on the TCEQ Core Data Form.
[4] Site Operator is defined in 30 TAC 330.3(148) as the holder of, or the applicant for, an authorization (or license) for a municipal solid waste facility.

4. Application Fee

Amount

☒ $2,050—New Landfill Permits, and Landfill Permit Major Amendments Described in 30 TAC 305.62(j)(1)

☐ $150—Other Permits, Permit Amendments, Limited Scope Major Amendments, and all Registrations

Payment Method

☒ Online through ePay portal www3.tceq.texas.gov/epay/

Enter ePay Trace Number: 582EA000632221

☐ Check (send to TCEQ Financial Administration Division)

Payor Name: _____ Check Number: _____

5. Electronic Versions of Application

TCEQ will publish electronic versions of the application online. Applicants must provide a clean copy of the administratively complete application and technically complete application. TCEQ will also publish electronic versions of NOD responses online.

6. Party Responsible for Publishing Notice

Indicate who will be responsible for publishing notice:

☐ Applicant ☐ Agent in Service ☒ Consultant

Contact Name: TONYA KOLLER

Title: PROJECT MANAGER

Email Address: [redacted]

7. Alternative Language Notice

Use the Alternative Language Checklist on Public Notice Verification Form TCEQ-20244-Waste-NORI, TCEQ-20244-Waste-NAPD, or TCEQ-20244-Waste-NAORPM available at www.tceq.texas.gov/permitting/waste_permits/msw_permits/msw_notice.html to determine if an alternative language notice is required.

Is an alternative language notice required for this application?

☒ Yes ☐ No

Indicate the alternative language: SPANISH

PAGE REVISION DATE: 5/16/2025

12. General Information About the Facility

Facility Regulated Entity Name:
GREATER EL PASO LANDFILL

Contact Name: NICHOLAS YBARRA, P.E. Title: DIRECTOR OF ENVIRON. SERVICE

MSW Authorization Number (if existing): 2284A

Regulated Entity Reference Number: **RN** 101478766

Physical or Street Address (if available): 2600 DARRINGTON ROAD

City: EL PASO County: EL PASO State: TX Zip Code: 79928

Phone Number: (915) 212-6000

Latitude (decimal degrees, six decimal places): 31.602233

Longitude (decimal degrees, six decimal places): -106.163511

Elevation (above mean sea level): 3987 feet (benchmark elevation for landfills)

Description of facility location with respect to known or easily identifiable landmarks:

The facility is located approximately 23.5 miles from downtown El Paso, Texas, while traveling southbound along Interstate 10 (I-10). The facility is located approximately 1.25 miles east of the intersection of I-10 and Darrington Road/Farm-to-Market (F.M.) 1110.

Access routes from the nearest United States or state highway to the facility:

The facility can be accessed via I-10, Exit 42 and proceed eastbound on Darrington Road. The facility entrance is located approximately 0.25 miles northeast of the intersection of I-10 and Darrington Road/F.M. 1110.

Coastal Management Program

Is the facility within the Coastal Management Program boundary?

☐ Yes ☒ No

13. Facility Types

Facility types are described in 30 TAC 330.5(a).

Indicate facility type (select all that apply):

☒ Type I ☐ Type IV ☐ Type V

☐ Type IAE ☐ Type IVAE ☐ Type VI

14. Activities Conducted at the Facility

☒ Storage ☐ Processing ☒ Disposal

18. Facility Supervisor License

Indicate the level of Municipal Solid Waste Facility Supervisor license, as defined in 30 TAC Chapter 30, Occupational Licenses and Registrations, Subchapter F that the individual who supervises or manages the operations will obtain prior to commencing operations.

■ Class A Supervisor License ☐ Class B Supervisor License

19. Facility Ownership

Facility Owner

Does the Site Operator (Permittee or Registrant) own all the facility units and all the facility property?

■ Yes ☐ No

If "No", provide the following information for the other owner, and include a Core Data Form for the other owner. Attach supplemental sheet if more than one other owner.

Other Owner Name: _____

What is Owned: ☐ Facility Units ☐ Property

☐ Other (describe): _____

Mailing Address: _____

City: _____ County: _____ State: ____ Zip Code: _____

Phone Number: _____

Email Address: _____

20. Other Government Entities Information

Texas Department of Transportation

District: ELP

District Engineer's Name: TOMAS TREVINO, P.E.

Mailing Address: 13301 GATEWAY WEST

City: EL PASO County: EL PASO State: TX Zip Code: 79928

Phone Number: 915-790-4204

Email Address [redacted]

Local Government Authority Responsible for Road Maintenance (if applicable)

Government or Agency Name: EL PASO COUNTY

Contact Person's Name: FERNANDO HERNANDEZ

Mailing Address: 800 E. OVERLAND AVE SUITE 200

City: EL PASO County: EL PASO State: TX Zip Code: 79901

Phone Number: 915-273-3330

Email Address: [redacted]

City Mayor Information

City Mayor's Name: MAYOR RENARD JOHNSON
Mailing Address: 300 N. CAMPBELL
City: EL PASO County: EL PASO State: TX Zip Code: 79901
Phone Number: 915-212-0021
Email Address: [redacted]

City Health Authority

Authority Name: CITY OF EL PASO
Contact Person's Name: DR. HECTOR OCARANZA
Contact Person's Title: CITY/COUNTY PUB. HEALTH AUTHORITY
Mailing Address: 5115 EL PASO DRIVE
City: EL PASO County: EL PASO State: TX Zip Code: 79905
Phone Number: 915-212-0200
Email Address [redacted]

County Judge Information

County Judge's Name: JUDGE RICARDO A. SAMANIEGO
Mailing Address: 500 E. SAN ANTONIO AVENUE, SUITE 301
City: EL PASO County: EL PASO State: TX Zip Code: 79901
Phone Number: 915-546-2098
Email Address [redacted]

County Health Authority

Agency Name: SEE CITY HEALTH AUTHORITY
Contact Person's Name:
Contact Person's Title:
Mailing Address:
City: County: State: TX Zip Code:
Phone Number:
Email Address:

State Representative Information

House District Number: 75
State Representative's Name: REP. MARY E. GONZALEZ
District Office Mailing Address: P.O. BOX 1343
City: SAN ELIZARIO County: EL PASO State: TX Zip Code: 79849
Phone Number: 915-851-6632
Email Address: [redacted]

State Senator Information

District Number: 29

State Senator's Name: SENATOR CESAR BLANCO

District Office Mailing Address: P.O. BOX 12068

City: AUSTIN County: TRAVIS State: TX Zip Code: 78711

Phone Number: 512-463-0129

Email Address: [redacted]

Council of Governments (COG)

COG Name: RIO GRANDE COUNCIL OF GOVERNMENTS

COG Representative's Name: ANNETTE GUTIERREZ

COG Representative's Title: EXECUTIVE DIRECTOR

Mailing Address: 8037 LOCKHEED, SUITE 100

City: EL PASO County: EL PASO State: TX Zip Code: 79925

Phone Number: 915-533-0998

Email Address: [redacted]

River Basin Authority

Authority Name: INTERNATIONAL BOUNDARY AND WATER COMMISSION (IBWC)

Contact Person's Name: RAMON MACIAS

Watershed Sub-Basin Name: UPPER RIO GRANDE

Mailing Address: 4191 NORTH MESA ST

City: EL PASO County: EL PASO State: TX Zip Code: 79902

Phone Number: 915-832-4749

Email Address [redacted]

Local Drainage or Flood Management Authority

Authority Name: EL PASO COUNTY

Contact Person's Name: GILBERT SALDANA JR

Mailing Address: 500 EAST SAN ANTONIO

City: EL PASO County: EL PASO State: TX Zip Code: 79901

Phone Number: 915-273-3330

Email Address: [redacted]

U.S. Army Corps of Engineers District

Indicate the U.S. Army Corps of Engineers district in which the facility is located:

☒ Albuquerque, NM ☐ Galveston, TX

☐ Fort Worth, TX ☐ Tulsa, OK

PAGE REVISION DATE: 5/16/2025

Applicant Signature Page

Site Operator (Permittee or Registrant Name) or Authorized Signatory

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name: Nicholas Ybarra, P.E. Title: Director of Environmental Services

Email Address: YbarraNN@elpasotexas.gov

Signature: _____ Date: 5-16-25

Authorization by Facility Owner for Operator to Submit Application

To be completed by the facility owner if the application is submitted by an operator who is not the facility owner.

I am the owner of the facility that is the subject of this application, and authorize the operator, _____ to submit this application pursuant to 30 TAC 305.43(c).

Name: _____ Title: _____

Email Address: _____

Signature: _____ Date: _____

Notary

SUBSCRIBED AND SWORN to before me by the said Nicholas Ybarra

On this 16 day of May, 2025

My commission expires on the 10 day of March, 2029

_____

Notary Public in and for

El Paso County Texas (notary's jurisdiction, including county and state)

Note: Application Must Bear Signature & Seal of Notary Public

Itza Mar Jaramillo
My Commission Expires
3/10/2029
Notary ID131254408

Part I Attachments

Refer to instruction document TCEQ 00650-instr[5] for professional engineer seal requirements.

Attachments Table 1. Required attachments.

Required Attachments	Attachment Number
Supplementary Technical Report [30 TAC 305.45(a)(8)]	Appendix I/II.J
Property Legal Description [30 TAC 330.59(d)(1)]	Appendix I/II.D
Property Metes and Bounds Description [30 TAC 330.59(d)(1)]	Appendix I/II.D
Facility Legal Description [30 TAC 330.59(d)(1)]	Appendix I/II.D
Facility Metes and Bounds Description [30 TAC 330.59(d)(1)]	Appendix I/II.D
Metes and Bounds Drawings [30 TAC 330.59(d)(1)]	Appendix I/II.D
On-Site Easements Drawing [30 TAC 330.61(c)(10)]	Appendix I/II.A
Land Ownership Map [30 TAC 330.59(c)(3)]	App I/II.A-Fig I/II.A.10
Landowners List [30 TAC 330.59(c)(3)]	Appendix I/II.A.5T1
Mailing Labels (in electronic file, in Avery 5160 format; see instructions) [30 TAC 281.5(7)]	Appendix I/II.A.5T1
General Location Maps [30 TAC 330.59(c)(2)]	App I/II.A-Fig I/II.A.1
Texas Department of Transportation (TxDOT) County Map [30 TAC 330.59(c)(2)]	App I/II.A-Fig I/II.A.5
General Topographic Maps [30 TAC 330.61(e)]	App I/II.A-Fig I/II.A.6
Verification of Legal Status / Legal Authority (certificate of incorporation) [30 TAC 281.5 and 330.59(e)]	Appendix I/II.D
Evidence of Competency [30 TAC 330.59(f)]	Appendix I/II.F
Signatory Authority Documentation [30 TAC 305.44 and 330.59(g)]	Part I Form, Pg.12
TCEQ Core Data Form(s) TCEQ-10400[6] [30 TAC 281.5(7)]	Appendix I/II.K

[5] www.tceq.texas.gov/downloads/permitting/waste-permits/msw/forms/00650-instr.pdf
[6] www.tceq.texas.gov/permitting/central_registry/guidance.html

CERTIFICATION

Permit/Registration No. 2284

Applicant: City of El Paso

I, Nicholas Ybarra — *Typed or printed name*

Director — *Title*

certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

I further certify that I am authorized under 30 Texas Administrative Code §305.44 to sign this document and can provide documentation in proof of such authorization upon request.

Signature: [signature] Date: 5-16-25

Please replace the Part II Form with the following pages

III. Waste Acceptance Plan - 30 TAC §330.61(b)

1. ☑ If this application is for a Type I or Type IAE MSW landfill facility, attach completed Form No. TCEQ-20873. Attachment No.: Appendix I/II.C
2. ☐ If this application is for a Type IV or Type IVAE MSW landfill facility, attach completed Form No. TCEQ-20890. Attachment No.:

IV. General Location Maps - 30 TAC §330.61(c)

Provide General Location Maps that accurately show the features listed below. Provide all General Location Maps in a single attachment and include the drawing number in the space provided. Include notes on each map, as needed, to describe information pertaining to the map.

1. The prevailing wind direction with a wind rose. Figure I/II.A.5b
2. All known water wells within 500 feet of the proposed permit boundary with the state well numbering system designation for Water Development Board "located wells."

Figure I/II.A.2

3. All structures and inhabitable buildings within 500 feet of the proposed facility.

Figure I/II.A.2

4. (i) Schools, (ii) licensed day-care facilities, (iii) churches, (iv) hospitals, (v) cemeteries, (vi) ponds, (vii) lakes, and (viii) residential, (ix) commercial, and (x) recreational areas within one mile of the facility. Figure I/II.A.9
5. The location and surface type of all roads within one mile of the facility that will normally be used by the owner or operator for entering or leaving the facility. Figure I/II.A.5
6. Latitudes and longitudes. Figure I/II.A.1
7. Area streams. Figure I/II.A.2
8. Airports within six miles of the facility. Figure I/II.A.4
9. The property boundary of the facility. Figure I/II.A.2
10. (i) Drainage, (ii) pipeline, and (iii) utility easements within or adjacent to the facility.

Figure I/II.A.2, Figure I/II.A.3

11. (i) Facility access control features. Figure I/II.A.2
12. (i) Archaeological sites, (ii) historical sites, and (iii) sites with exceptional aesthetic qualities adjacent to the facility. Figure I/II.A.9

V. Facility Layout Maps - 30 TAC §330.61(d)

Provide the Facility Layout Map(s) as a single attachment, and include drawing number(s) in the space provided. Include notes on each map, as needed, to describe information on the map.

Provide a map or set of maps of the facility layout showing:

1. The outline of the units; Figure I/II.B.2
2. General locations of main interior facility roadways; Figure I/II.B.2
3. Locations of monitor wells; Figure I/II.B.2
4. Locations of buildings; Figure I/II.B.2

6. Check the following facilities if they are within one mile of the facility boundary and indicate on map. Figure I/II.A.9

   (a) ☑ residences;

   (b) ☑ commercial establishments;

   (c) ☐ schools;

   (d) ☐ licensed day-care facilities;

   (e) ☐ churches;

   (f) ☐ cemeteries;

   (g) ☐ ponds or lakes; and

   (h) ☐ recreational areas.

IX. Impact on Surrounding Area - 30 TAC §330.61(h)

Address the facility's impacts on cities, communities, groups of property owners, or individuals and describe mitigation of conditions as required. Attach additional pages as necessary. If a land use compatibility analysis report prepared by a qualified professional is provided, indicate the location within the application. Attachment No.: Not applicable.

1. **Impacts to Surrounding Areas:**
   (a) Provide information regarding the likely impacts of the facility on cities, communities, groups of property owners, or individuals by analyzing the compatibility of land use, zoning in the vicinity, community growth patterns, and other factors associated with the public interest; and

This is an existing facility requesting a vertical expansion. Impacts to surrounding areas will be minimal based on surrounding land use and community growth patterns, as shown in Figures I/II.A.9 (Land Use Map) and I/II.A.5 - I/II.A.5.b (Zoning Map & Wind Rose). The growth trends within 5 miles of the facility appear to be to the SW, W, NW, N, and NE of the facility over the past 10 years. In general, there is minimal development around the facility.

   (b) Describe any special design considerations and possible mitigation of potential impacts, as necessary.

Not applicable.

Published Zoning Map: If available, provide a published zoning map for the facility and within two miles of the facility for the county or counties in which the facility is or will be located.

I/II.A.5

2. **Special or Nonconforming Use Permit:**

   (a) Does the site require approval as a nonconforming use or a special permit from the local government having jurisdiction? ☐ Yes ☑ No

   (b) If yes, provide a copy of such approval. Attachment No.: Not applicable.

3. **Character of Surrounding Land Use:** Describe the character of the surrounding land uses within one mile of the proposed facility.

This is an existing facility requesting a vertical expansion of Phases 1/2. The majority of the current and future land uses within one mile of the facility is remote/undeveloped or industrial. There are commercial establishments to the northwest and north of the facility and residential to the northwest and northeast. Figure I/II.A.9 depicts land use within one mile of the proposed facility.

4. **Growth Trends and Directions of Major Development:**
   (a) Provide information about growth trends within five miles of the facility.

The growth trends within five miles of the facility appears to be expansion into the areas to the southwest, west, northwest, north, and northeast of the facility over the past 10 years. Growth trend observations are based on Google Earth historical imagery. According to the U.S. Census Bureau data, the average annual population growth rate in El Paso County from 2020 to 2024 is 0.28%. Population growth is expected to remain minimal.

   (b) Describe the directions of major development.

The direction of major development is towards the facility from the northeast, north, northwest, west, and southwest. No major development is observed to the east, southeast, or south of the facility.

5. **Number of and Proximity to Residences and Other Uses:** Indicate the approximate number and proximity of residences and other uses within one mile of the facility as follows. Population density and proximity to residences and other uses may be considered in the assessment.

   (a) Number of, distance, and directions to residences:

188 residences; nearest is approximately 2,180 feet north of the facility. See Figure I/II.A.9

      (i) Indicate the distance to the nearest residences: 2180 feet

      (ii) Provide directions to the nearest residences:

North

   (b) Number of, distance, and directions to commercial establishments:

13 commercial establishments; nearest is approximately 1,900 feet north of the facility. See Figure I/II.A.9

      (i) Indicate the distance to the nearest commercial establishments: 1900 feet

      (ii) Provide directions to the nearest commercial establishments:

North

   (c) Number of, distance, and directions to schools:

No schools within one mile of the facility were identified.

   (d) Number of, distance, and directions to churches:

No churches within one mile of the facility were identified.

   (e) Number of, distance, and directions to cemeteries:

No cemeteries within one mile of the facility were identified.

   (f) Number of, distance, and directions to historic structures and sites:

No historic structures and sites within one mile of the facility were identified.

(iii) Demonstrate the integrity of the landfill unit and its ability to protect ecological resources by addressing the following factors showing that the municipal solid waste landfill unit or recovery operation will not cause or contribute to significant degradation of wetlands:
Not applicable.

(1) erosion, stability, and migration potential of native wetland soils, muds, and deposits used to support the landfill unit; Not applicable.

(2) erosion, stability, and migration potential of dredged and fill materials used to support the landfill unit; N/A

(3) the volume and chemical nature of the waste managed in the landfill unit; N/A

(4) impacts on fish, wildlife, and other aquatic resources and their habitat from release of the solid waste; N/A

(5) the potential effects of catastrophic release of waste to the wetland and the resulting impacts on the environment; and N/A

(6) any additional factors, as necessary, to demonstrate that ecological resources in the wetland are sufficiently protected. N/A

(iv) Demonstrate steps taken to minimize unavoidable impacts to wetlands to the maximum extent practicable. Not applicable.

(v) Demonstrate offsetting of remaining unavoidable wetland impacts through all appropriate and practicable compensatory mitigation actions (e.g., restoration of existing degraded wetlands or creation of man-made wetlands). Not applicable.

XVI. Endangered or Threatened Species - 30 TAC §330.61(n) and §330.551

1. Provide Endangered Species Act compliance demonstrations as required under applicable state and federal laws. Attachment No.: App I/II.H

2. Determine and discuss whether the facility is in the range of endangered or threatened species.

No endangered or threatened species were identified within this existing facility.

3. If the facility is located in the range of endangered or threatened species, provide a biological assessment prepared by a qualified biologist in accordance with standard procedures of the United States Fish and Wildlife Service (USFW) and the Texas Parks and Wildlife Department (TPWD) to determine the effect of the facility on the endangered or threatened species. Where a previous biological assessment has been made for another project in the general vicinity, a copy of that assessment may be submitted for evaluation. Attachment No.: N/A

4. Provide coordination correspondence with and responses from the USFW and the TPWD concerning locations and specific data relating to endangered and threatened species in Texas.
Appendix I/II.H

5. Describe how the facility will comply with recommendations from the TPWD and USFW regarding protection of endangered and threatened species.
Not applicable.

6. Discuss the impact of the solid waste disposal facility upon endangered or threatened species:

This is an existing facility. There will be no impact of the solid waste disposal facility upon endangered or threatened species, as previously concluded.

Please replace Appendix I-II.A with the following pages

APPENDIX I-II.A – MAPS & PHOTOGRAPHS

Access Roadway	Surface Type
Darrington Road	Asphalt
Interstate 10	Asphalt
Las Colonias Road	Asphalt
Frontage Road (Facility Road)	Asphalt

Lat. 31° 36' 06.04583°N
Long. 106° 09' 48.64117°W

Lat. 31° 35' 17.38022°N
Long. 106° 10' 18.71737°W

Quail Mesa Colonia
Vista Larga Colonia
Vista Larga Number 2 Colonia
Ascencion Park Estates Colonia
East Clint Estates Colonia
Clint
Morning Glory
San Lorenzo Cemetery
Clint High School
San Elizario High School

Gateway Blvd E
Las Colonias Rd
Roberts Ranch Rd
Perlite Dr
Mica Dr
Pratt Dr
Clint Rd
Power Rd
Ascencion Dr
Nacht Rd
N Loop Dr
Clint Cutoff Rd
Alameda Ave
Celum Rd
Frey Rd
Mallard Ave
Denton St
Lawson
Tierra Rd
Estate
N Loop Dr
Young John St
Cage St
Mesa Drain Rd
Coker Rd
Wolsey
Shaftsbury
Fitzroy Dr

For Permitting Purposes Only

Railroad
TxDOT Roadways
1-Mile Project Radius
2-Mile Project Radius
Property/Permit Boundary

General Commercial
Industrial/Commercial-Mixed Use District
Light Industrial
Unclassified

Notes:
1. Map source: Texas Department of Transportation (TxDOT) Roadways, El Paso District, 2022.
2. Railroad layer source: TxDOT, Texas Railroads, 2023.
3. Facility coordinates source: Boundary Survey, A Portion of Section 16, and 25 Township 4 Block 78. T & P Ry. Co. Survey, El Paso County Texas, 1997.
4. City of Socorro Zoning source: City of Socorro Planning and Zoning Department, 2024, accessed on October 1, 2024.

NORTH

1 0.5 0 1
Miles

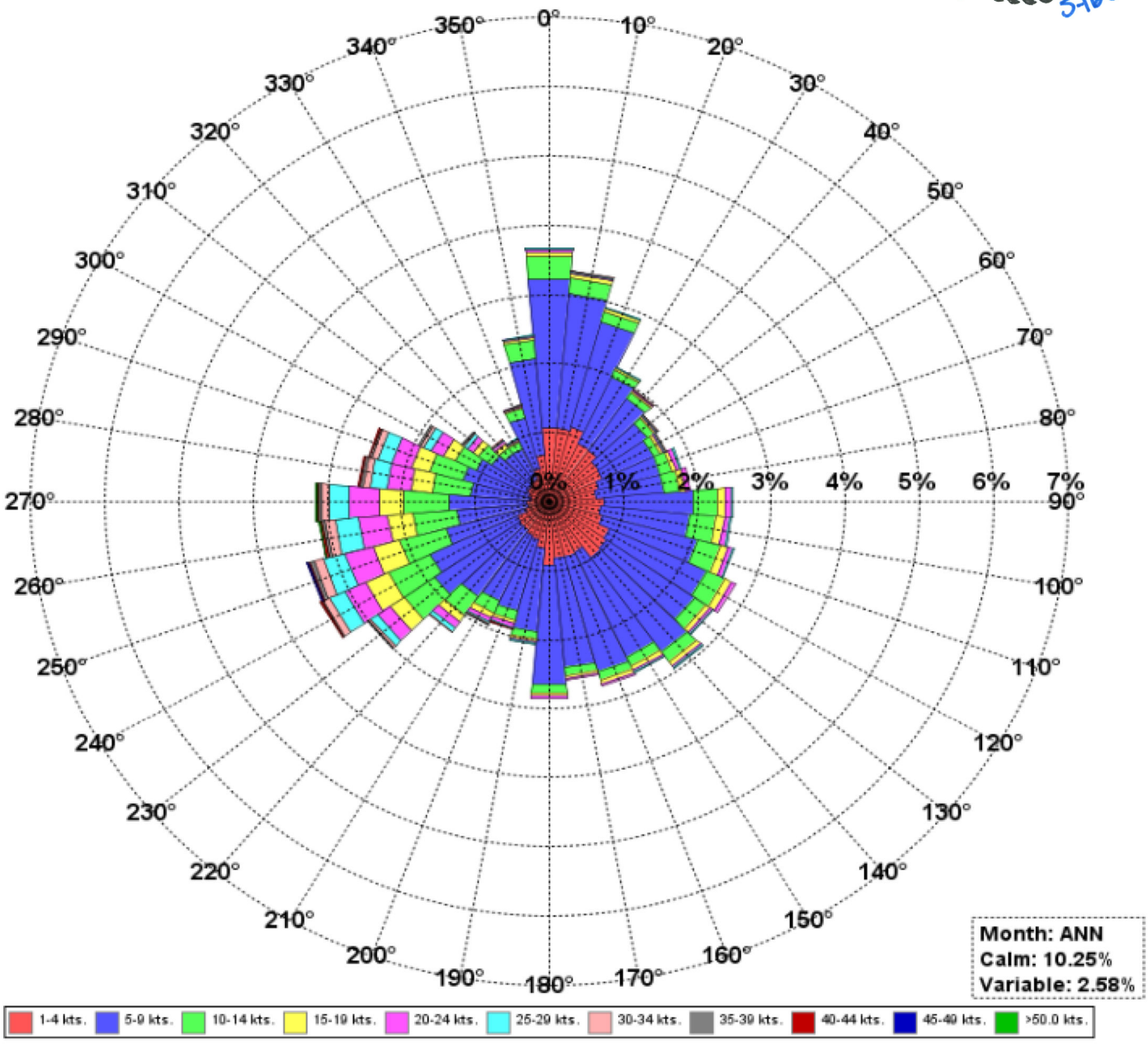
STATE OF TEXAS
TONYA L. KOLLER
133943
LICENSED
PROFESSIONAL ENGINEER
5-16-25

BURNS McDONNELL

Figure I/II.A.5
Zoning Map
Greater El Paso Landfill
MSW Auth #2284A
El Paso County, Texas

Issued: 3/10/2025

Source: Esri, BMcD, TxDOT, TWDB, Texas Railroad Commission



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TONYA L. KOLLER
133943
LICENSED
PROFESSIONAL ENGINEER
3-16-25

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BURNS McDONNELL

Figure I/II.A.5.b
Wind Rose
Greater El Paso Landfill
MSW Auth #2284A
El Paso County, Texas

Path: C:\GIS Projects\El Paso\El Paso Figures\El Paso Figures.aprx embillings 3/10/2025
Service Layer Credits:

Source: Esri, BMcD, TxDOT, TWDB, Texas Railroad Commission

Issued: 3/10/2025

USGS science for a changing world

U.S. DEPARTMENT OF THE INTERIOR
U.S. GEOLOGICAL SURVEY

The National Map US Topo

CLINT QUADRANGLE
TEXAS - EL PASO COUNTY
7.5-MINUTE SERIES

Lat. 31° 36' 06.04583°N
Long. 106° 09' 48.64117°W

Lat. 31° 35' 17.38022°N
Long. 106° 10' 18.71737°W

STATE OF TEXAS
TONYA L. KOLLER
133943
LICENSED
PROFESSIONAL ENGINEER
5-16-25

Produced by the United States Geological Survey
North American Datum of 1983 (NAD83)
World Geodetic System of 1984 (WGS84). Projection and 1 000-meter grid: Universal Transverse Mercator, Zone 13R
This map is not a legal document. Boundaries may be generalized for this map scale. Private lands within government reservations may not be shown. Obtain permission before entering private lands.

Imagery	NAIP,	August 2016 - November 2016
Roads	U.S. Census Bureau,	2015 - 2018
Names	GNIS,	1979 - 2021
Hydrography	National Hydrography Dataset,	2003 - 2018
Contours	National Elevation Dataset,	2021
Boundaries	Multiple sources; see metadata file	2019 - 2021
Wetlands	FWS National Wetlands Inventory	Not Available

UTM GRID AND 2019 MAGNETIC NORTH DECLINATION AT CENTER OF SHEET

SCALE 1:24 000
1 KILOMETERS 0.5 0 1 2
1000 METERS 500 0 1000 2000
1 MILES 0.5 0 1
1000 FEET 0 1000 2000 3000 4000 5000 6000 7000 8000 9000 10000

CONTOUR INTERVAL 20 FEET
NORTH AMERICAN VERTICAL DATUM OF 1988

This map was produced to conform with the National Geospatial Program US Topo Product Standard.

TEXAS
QUADRANGLE LOCATION

ADJOINING QUADRANGLES
1 Ysleta
2 Clint NW
3 Clint NE
4 San Elizario
5 Clint SE
6 Isla
7 Tornillo

ROAD CLASSIFICATION
Expressway — Local Connector
Secondary Hwy — Local Road
Ramp — 4WD
Interstate Route — US Route — State Route

CLINT, TX, CHH
2022

For Permitting Purposes Only

Property/Permit Boundary

Notes:
1. Map source: U.S. Geological Survey, 20220517, US Topo 7.5-minute map for Clint, TX, CHH.
2. Facility coordinates source: Boundary Survey, A Portion of Section 16, and 25 Township 4 Block 78. T & P Ry. Co. Survey, El Paso County Texas, 1997.

BURNS McDONNELL

Figure I/II.A.6
USGS 7.5-Minute Map
Greater El Paso Landfill
MSW Auth #2284A
El Paso County, Texas

Please replace Appendix I-II.B with the following pages

APPENDIX I-II.B – FACILITY LAYOUT DRAWING

Greater El Paso Landfill

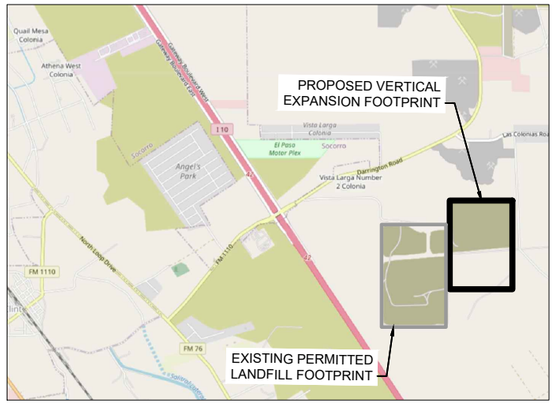
Vertical Expansion Permit Amendment

City of El Paso, TX

MSW Authorization No. 2284A

DECEMBER 2023

BMcD Project No. 155488



GENERAL LOCATION MAP

0 10000' 20000'
SCALE IN FEET

ONE OR TWO CHARACTER DISCIPLINE DESIGNATOR (MAY NOT BE PRESENT IF CALLOUT AND TITLE ARE ON DRAWINGS WITHIN THE SAME DISCIPLINE)

LETTER OR NUMBER DESIGNATOR

DRAWING SEQUENCE NUMBER INDICATES WHERE TITLE IS LOCATED (MAY NOT BE PRESENT IF CALLOUT AND TITLE ARE ON THE SAME DRAWING)

SECTION, DETAIL, AND ELEVATION SYMBOL IDENTIFIERS

A / EP001 — A / EP001

SECTION CALLOUT EXAMPLE

7 / EP001

DETAIL CALLOUT EXAMPLE

B / A001

ELEVATION CALLOUT EXAMPLE

THE WORD "SECTION" MAY BE REPLACED WITH "ELEVATION" OR "DETAIL"

SECTION A / 001

SECTION, DETAIL, OR ELEVATION TITLE EXAMPLE

SECTION, DETAIL, AND ELEVATION IDENTIFICATION SYSTEM

List of Drawings

SHEET INDEX	
DWG NO.	**SHEET TITLE**
I/II.B.0	SHEET INDEX
I/II.B.1	GENERAL NOTES, LEGEND, AND ABBREVIATIONS
I/II.B.2	EXISTING SITE LAYOUT
I/II.B.3	LANDFILL CELL EXPANSION PLAN
I/II.B.4	WASTE PLACEMENT PHASING PLAN
I/II.B.5	MAXIMUM ELEVATIONS

STATE OF TEXAS
TONYA L. KOLLER
133943
LICENSED
PROFESSIONAL ENGINEER
5-16-25

TONYA L. KOLLER P.E.
LICENSE NO. 133943

no.	date	by	ckd	description
0	12/31/23	TMC	TLK	2284A PERMIT MOD
1	5/16/25	AAN	TJS	TCEQ NOD 1

FOR PERMITTING PURPOSES ONLY

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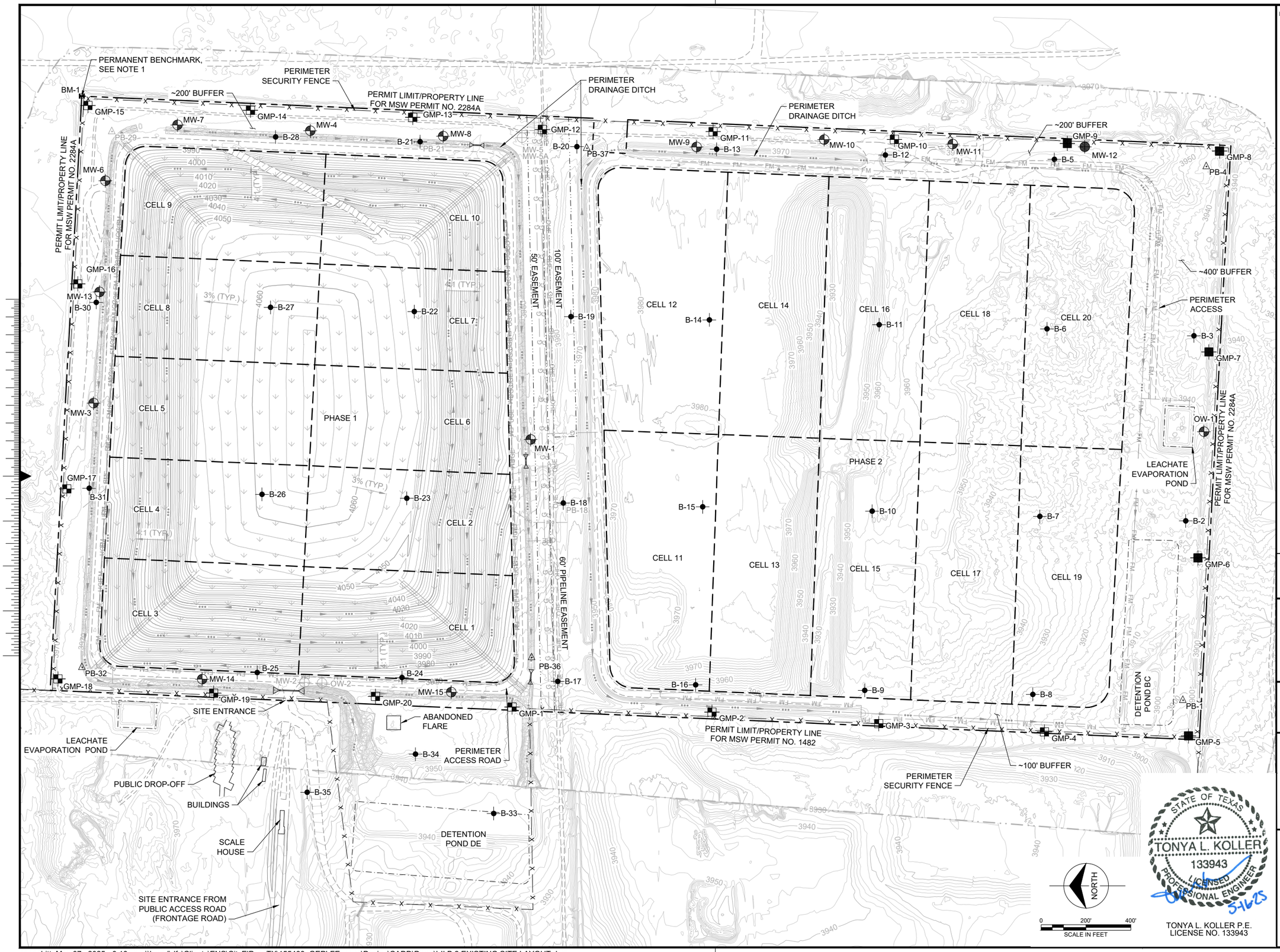
9400 WARD PARKWAY
KANSAS CITY, MO 64114
816-333-9400
Burns & McDonnell Engineering Co, Inc.
FIRM REG. NO. F-845

COVER - INDEX



no.	date	by	ckd	description
0	12/31/23	TMC	TLK	2284A PERMIT MOD
1	5/16/25	AAN	TJS	TCEQ NOD 1

NOTES:

1. PERMANENT BENCHMARK 3" Ø BRASS CAP SET IN CONCRETE (NAD83)
   N: 10,594,029.88 FEET
   E: 482,320.00 FEET
   ELEV:3986.67 FEET (NAVD88)
   LATITUDE: 31.602233
   LONGITUDE: -106.163511
2. INDEX CONTOUR INTERVAL, 2 FEET.
3. GREATER EL PASO LANDFILL EXISTING SITE TOPOGRAPHY (2284A PERMIT AREA) DERIVED FROM ORTHO-PHOTOGRAPHY FROM AN UNMANNED AERIAL SURVEY TIED TO GROUND CONTROL PANELS PROVIDED BY PARKHILL, SMITH & COOPER, AUGUST 28, 2019. TOPOGRAPHY WITHIN CELLS 11 THROUGH 14 COMPLETED WITH GROUND CONTROL POINTS PROVIDED BY THE CITY OF EL PASO, AUGUST 2022. TOPOGRAPHY OUTSIDE OF THE SURVEY EXTENTS WAS OBTAINED FROM THE TEXAS NATURAL RESOURCES INFORMATION SYSTEM, DATED APRIL 2008. SURVEY LIMITS SHOWN ON DRAWING I/II.B.2.
4. THE SURVEY COORDINATES ARE ON THE TEXAS COORDINATE SYSTEM, CENTRAL ZONE 4203, NORTH AMERICAN DATUM OF 1983 (NAD83). HORIZONTAL DATUM IS NAD 1983. VERTICAL DATUM IS NAVD 1988.
5. EXISTING TOP OF FINAL COVER SURFACE FOR PHASE 1 PREPARED BY PARKHILL, SMITH & COOPER, INC. AND REPRESENTS DESIGN FINAL COVER ELEVATIONS. CONTOUR INTERVAL IS 2 FEET. PHASE 1 RECEIVED FINAL COVER IN 2021.
6. AT THE TIME OF DRAWING PREPARATION, WASTE PLACEMENT IS CURRENTLY OCCURRING IN CELLS 11-14, WHICH WERE CONSTRUCTED IN 2018.

FOR PERMITTING PURPOSES ONLY

BURNS McDONNELL
9400 WARD PARKWAY
KANSAS CITY, MO 64114
816-333-9400
Burns & McDonnell Engineering Co, Inc.
FIRM REG. NO. F-845

date	detailed
DECEMBER 2023	D. KAMBLE
designed	checked
T. CAMMACK	T. KOLLER

City of El Paso, Texas

2284A PERMIT AMENDMENT

EXISTING SITE LAYOUT

project	contract
155488	-

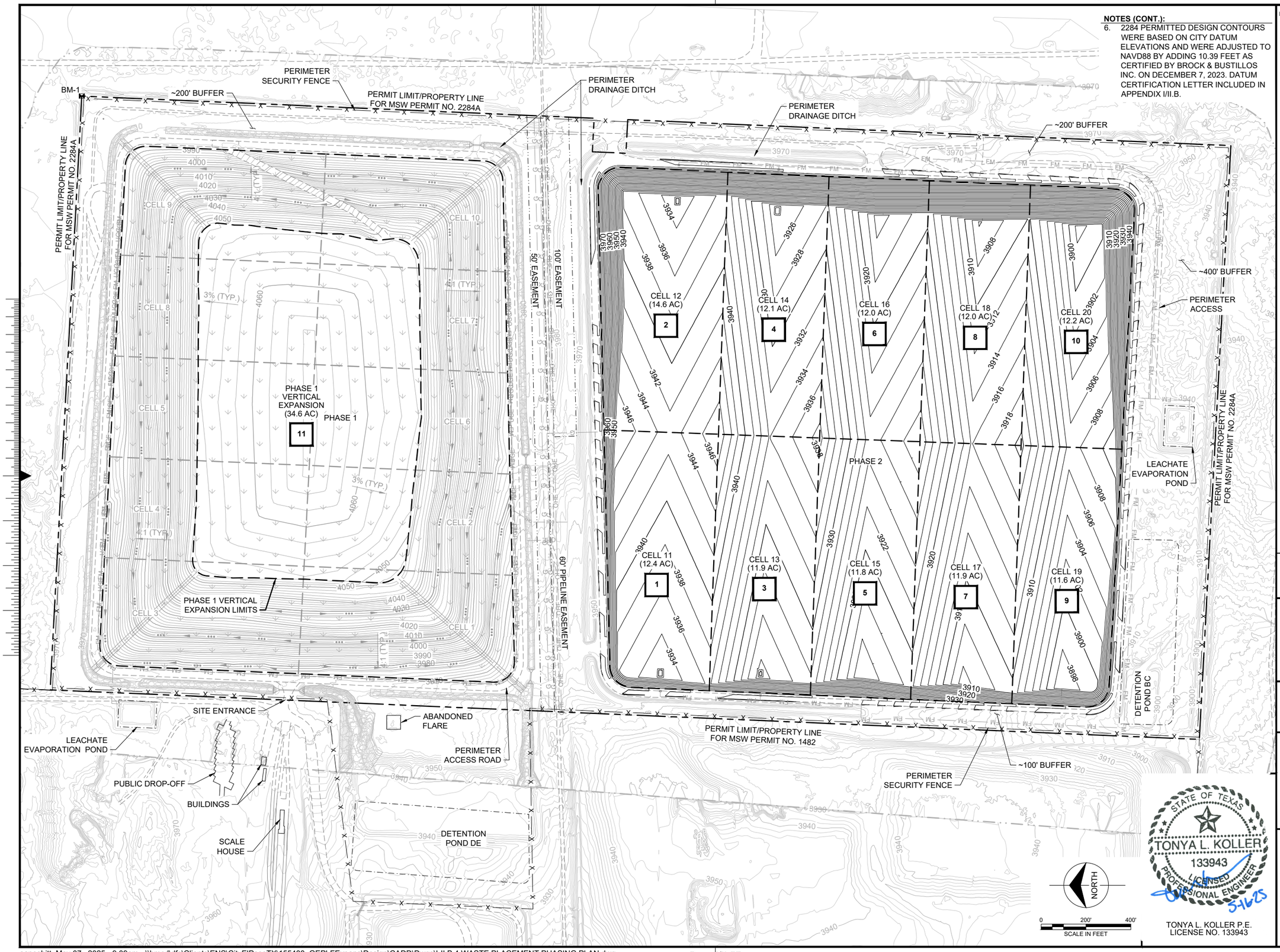
drawing **I/II.B.2** – rev. **1**

file I-II.B.2 EXISTING SITE LAYOUT.dwg

STATE OF TEXAS
TONYA L. KOLLER
133943
LICENSED
PROFESSIONAL ENGINEER
5-16-25

TONYA L. KOLLER P.E.
LICENSE NO. 133943

Scale For Microfilming
Millimeters
Inches



NOTES (CONT.):

6. 2284 PERMITTED DESIGN CONTOURS WERE BASED ON CITY DATUM ELEVATIONS AND WERE ADJUSTED TO NAVD88 BY ADDING 10.39 FEET AS CERTIFIED BY BROCK & BUSTILLOS INC. ON DECEMBER 7, 2023. DATUM CERTIFICATION LETTER INCLUDED IN APPENDIX I/II.B.

no.	date	by	ckd	description
0	12/31/23	TMC	TLK	2284A PERMIT MOD
1	5/16/25	AAN	TJS	TCEQ NOD 1

NOTES:

1. INDEX CONTOUR INTERVAL, 2 FEET.
2. GREATER EL PASO LANDFILL EXISTING SITE TOPOGRAPHY (2284A PERMIT AREA) DERIVED FROM ORTHO-PHOTOGRAPHY FROM AN UNMANNED AERIAL SURVEY TIED TO GROUND CONTROL PANELS PROVIDED BY PARKHILL, SMITH & COOPER, AUGUST 28, 2019. TOPOGRAPHY WITHIN CELLS 11 THROUGH 14 COMPLETED WITH GROUND CONTROL POINTS PROVIDED BY THE CITY OF EL PASO, AUGUST 2022. TOPOGRAPHY OUTSIDE OF THE SURVEY EXTENTS WAS OBTAINED FROM THE TEXAS NATURAL RESOURCES INFORMATION SYSTEM, DATED APRIL 2008. SURVEY LIMITS SHOWN ON DRAWING I/II.B.2.
3. THE SURVEY COORDINATES ARE ON THE TEXAS COORDINATE SYSTEM, CENTRAL ZONE 4203, NORTH AMERICAN DATUM OF 1983 (NAD83). HORIZONTAL DATUM NAD 1983. VERTICAL DATUM IS NAVD 1988.
4. EXISTING TOP OF FINAL COVER SURFACE FOR PHASE 1 PREPARED BY PARKHILL, SMITH & COOPER, INC. AND REPRESENTS DESIGN FINAL COVER ELEVATIONS. CONTOUR INTERVAL IS 2 FEET. PHASE 1 RECEIVED FINAL COVER IN 2021.
5. PHASE 2 DESIGN CONTOURS REPRESENT TOP OF PROTECTIVE COVER. CONTOUR INTERVAL IS 2 FEET.
6. CITY MAY ELECT TO CONSTRUCT MORE THAN ONE CELL AT A TIME (E.G, CELLS 11-14 WERE CONSTRUCTED AT THE SAME TIME).
7. PHASE 1 VERTICAL EXPANSION AND PHASE 2 CELLS 11-20 WILL BE FILLED WITH THE WASTE TYPES IDENTIFIED IN APPENDIX I/II.C - WASTE ACCEPTANCE PLAN.

FOR PERMITTING PURPOSES ONLY

BURNS McDONNELL
9400 WARD PARKWAY
KANSAS CITY, MO 64114
816-333-9400
Burns & McDonnell Engineering Co, Inc.
FIRM REG. NO. F-845

date	detailed
DECEMBER 2023	D. KAMBLE
designed	checked
T. CAMMACK	T. KOLLER

City of El Paso, Texas

2284A PERMIT AMENDMENT

WASTE PLACEMENT PHASING PLAN

project	contract
155488	-

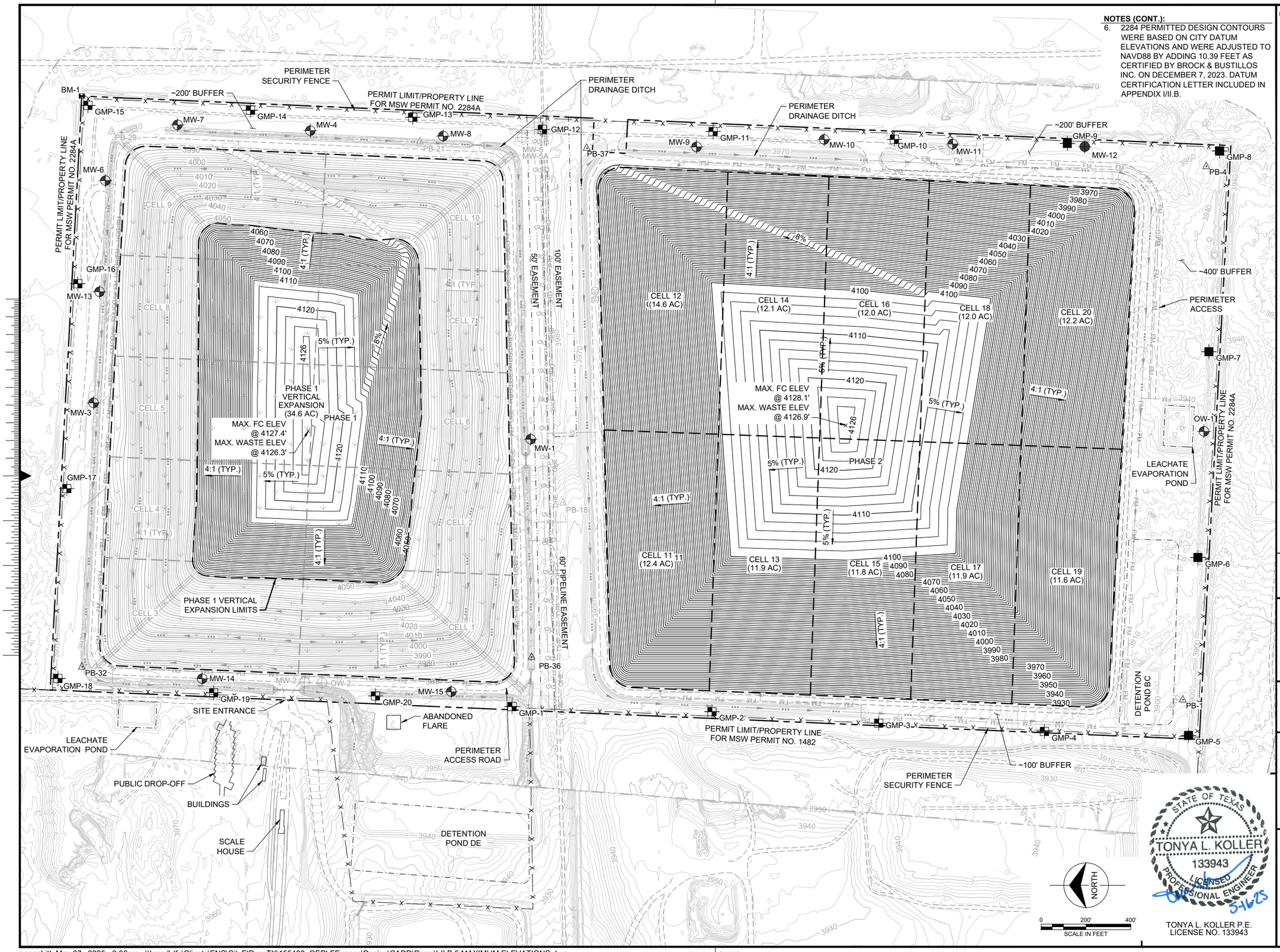
drawing **I/II.B.4** rev. **1**

file I-II.B.4 WASTE PLACEMENT PHASING PLAN.dwg

STATE OF TEXAS
TONYA L. KOLLER
133943
LICENSED
PROFESSIONAL ENGINEER
5-16-25

TONYA L. KOLLER P.E.
LICENSE NO. 133943

Scale For Microfilming
Millimeters
Inches



NOTES (CONT.):

6. 2284 PERMITTED DESIGN CONTOURS WERE BASED ON CITY DATUM ELEVATIONS AND WERE ADJUSTED TO NAVD88 BY ADDING 10.39 FEET AS CERTIFIED BY BROCK & BUSTILLOS INC. ON DECEMBER 7, 2023. DATUM CERTIFICATION LETTER INCLUDED IN APPENDIX I/II.B.

no.	date	by	ckd	description
0	12/31/23	TMC	TLK	2284A PERMIT MOD
1	5/16/25	AAN	TJS	TCEQ NOD 1

NOTES:

1. INDEX CONTOUR INTERVAL, 2 FEET.
2. GREATER EL PASO LANDFILL EXISTING SITE TOPOGRAPHY (2284A PERMIT AREA) DERIVED FROM ORTHO-PHOTOGRAPHY FROM AN UNMANNED AERIAL SURVEY TIED TO GROUND CONTROL PANELS PROVIDED BY PARKHILL, SMITH & COOPER, AUGUST 28, 2019. TOPOGRAPHY WITHIN CELLS 11 THROUGH 14 COMPLETED WITH GROUND CONTROL POINTS PROVIDED BY THE CITY OF EL PASO, AUGUST 2022. TOPOGRAPHY OUTSIDE OF THE SURVEY EXTENTS WAS OBTAINED FROM THE TEXAS NATURAL RESOURCES INFORMATION SYSTEM, DATED APRIL 2008. SURVEY LIMITS SHOWN ON DRAWING I/II.B.2.
3. THE SURVEY COORDINATES ARE ON THE TEXAS COORDINATE SYSTEM, CENTRAL ZONE 4203, NORTH AMERICAN DATUM OF 1983 (NAD83). HORIZONTAL DATUM IS NAD 1983. VERTICAL DATUM IS NAVD 1988.
4. EXISTING TOP OF FINAL COVER SURFACE FOR PHASE 1 PREPARED BY PARKHILL, SMITH & COOPER, INC. AND REPRESENTS DESIGN FINAL COVER ELEVATIONS. CONTOUR INTERVAL IS 2 FEET. PHASE 1 RECEIVED FINAL COVER IN 2021.
5. DESIGN CONTOURS REPRESENT TOP OF FINAL COVER SURFACE FOR PHASE 1 AND PHASE 2. CONTOUR INTERVAL IS 2 FEET.

FOR PERMITTING PURPOSES ONLY

BURNS McDONNELL
9400 WARD PARKWAY
KANSAS CITY, MO 64114
816-333-9400
Burns & McDonnell Engineering Co, Inc.
FIRM REG. NO. F-845

date	detailed
DECEMBER 2023	D. KAMBLE
designed	checked
T. CAMMACK	T. KOLLER

City of El Paso, Texas

2284A PERMIT AMENDMENT

MAXIMUM ELEVATIONS

project	contract
155488	-

drawing **I/II.B.5** – rev. **1**

file I-II.B.5 MAXIMUM ELEVATIONS.dwg

STATE OF TEXAS
TONYA L. KOLLER
133943
LICENSED PROFESSIONAL ENGINEER
5-16-25

TONYA L. KOLLER P.E.
LICENSE NO. 133943

Scale For Microfilming
Millimeters
Inches

Please replace Appendix I-II.C with the following pages

APPENDIX I-II.C – WASTE ACCEPTANCE PLAN

Specify any other wastes to be prohibited for disposal that are not listed above.
Not applicable.

E. Material Recovery

Will the facility recover materials from incoming waste? ☐ Yes ☑ No

If yes, provide a descriptive narrative describing the percentage of incoming waste, if applicable, that must be recovered and its intended use.

Not applicable.

F. Estimated Maximum Annual Waste Acceptance Rate Projected for Five Years [§330.61(b)(1)(C)]

Provide an **estimated** maximum annual waste acceptance rates at the facility, projected for five years. These rates are not permit limitations.

Table 1. Five-Year Projection for Waste Acceptance.

Year	Estimated Maximum Annual Waste Acceptance Rate
2025	520,000 tons/year (1,670 tpd)
2026	530,000 tons/year (1,700 tpd)
2027	540,000 tons/year (1,730 tpd)
2028	550,000 tons/year (1,760 tpd)
2029	560,000 tons/year (1,790 tpd)

Please replace Appendix I-II.G with the following pages

APPENDIX I-II.G – COORDINATION LETTERS

approximately 500 vpd. To calculate the approximate increase in vpd, calculations were based on an equal and proportional increase in the accepted waste tonnage and in the associated traffic volume. Details of the facility access roads within one mile of the facility are provided in the following sections.

2. Date of submission of the coordination documents to TXDOT: October 31, 2024

3. TXDOT's response received? ☒ Yes ☐ No

4. If "No" is checked in response to Item I.3 above, complete Items I.4 and I.5 below only after TxDOT's response is received.

5. Did TxDOT's response include recommendation of improvements to any of the roadways or intersections that lead to the site? ☐ Yes ☒ No

6. If you checked "Yes" in Item I.5 above, proceed to Section III., TxDOT's Recommended Roadway or Intersection Improvements (as applicable).

7. If you checked "No" in Item I.5 above, provide TxDOT's response to the traffic and location restrictions compliance coordination for the subject site: *(Enter TxDOT's response to coordination correspondence)* No recommendations from TxDOT (see response attached to this form)

III. TxDOT Recommended Roadway or Intersection Improvements (as applicable)

Enter TxDOT's recommendations for improvement of roadways or intersections that lead to the site:

1.

2.

3.

IV. Documentation of Coordination of Improvement Designs of Public Roadways (turning lanes, storage lanes, acceleration/deceleration lanes, etc.) at and Near the Site Entrances with Agencies that Exercise Maintenance Responsibility

1. Complete Table 1 with information regarding documentation of coordination of improvement designs for existing and proposed roads.

(b) Estimated Maximum Waste Acceptance Rate at any Time During Facility Life: 2,000 tons/day

3. Hours of Operation and Site Life

(a) a. Operating Hours: *Monday-Sunday 5:00AM-7:00PM*

(b) b. Waste Acceptance Hours: *Monday-Saturday 7:00AM-4:00PM*

(c) c. Estimated Site Life: Capacity anticipated to be depleted in FY2045

4. Other Information Used or Assumed in Estimating Transportation Data: The Waste Acceptance Plan Form, presented as Part I/II, Appendix I/II.C, details the quantities of waste to be accepted at the facility and the volume of vehicular traffic is strongly correlated to anticipated waste quantities.

anticipated to be similar to those currently experienced by the existing Greater El Paso Landfill.

IX. Highway Beautification

Enter facility distance from interstate or primary highways and screening information as required by 30 TAC 330.23(a).

1. Distance of Facility from Interstate or Primary Highway: 0.6 miles (3160 ft)

2. Type of Facility Screening Provided, if applicable: Not applicable.

X. Analysis of the Impact of the Facility upon Airports

Enter the Part, Appendix, Attachment, Section, and Page Number of the application where analysis of the impact of the facility upon airports is provided: Part II Application Form X.2.a-e and Figure I/II.A.5

XI. Documentation of Coordination with the Federal Aviation Administration for Compliance with Airport Location Restrictions

1. Applicant has submitted written information to FAA describing the facility location, maximum height of waste units, type of waste accepted at the facility, and other facility-relevant data and information as required: ☒ Yes ☐ No

   (a) Enter Date of Coordination Letter to FAA: October 31, 2024

   (b) Enter Date of FAA Response: December 2, 2024.

2. Indicate FAA Response and Final Action:

   ☒ FAA Acknowledged No Adverse Impact.

   ☐ FAA Recommended Safety Improvements. (*Complete Section XII if you check this item.*)

3. A copy of the Documentation of Coordination with FAA for compliance with airport location restrictions is attached herein. ☒Yes ☐No. If you checked "No" please explain:

Clapper, Eric

From: Omar Madrid [redacted]
Sent: Monday, April 7, 2025 9:43 AM
To: Clapper, Eric
Cc: Martin Sotelo
Subject: FW: TxDOT Internet E-Mail.
Attachments: Greater El Paso Landfill Permit 2284A - TxDOT Letter.pdf

Good morning Mr. Clapper,

We've reviewed your submittal and don't have any comments.

Let us know if you need anything else from TxDOT.

Thank you,

Omar

Omar Madrid, P.E.
Director of Maintenance
TxDOT El Paso District
915-790-4331

From: Clapper, Eric [redacted]
Sent: Thursday, March 27, 2025 9:23 AM
To: Omar Madrid [redacted]
Cc: Jennifer Wright [redacted]
Subject: RE: TxDOT Internet E-Mail.

Hi Omar,

Thanks for getting back to me. I've attached the letter and the associated transportation data form that goes with it. Please let me know if you have any questions.

Thanks,

Eric Clapper
Environmental Engineer
[redacted]
[redacted] Suite 400, La Jolla, CA 92037

M +1 262-751-5420 | [redacted]

BURNS McDONNELL

Explore career opportunities

From: Omar Madrid [redacted]
Sent: Wednesday, March 26, 2025 7:38 PM
To: Clapper, Eric <[redacted] Martin Sotelo [redacted]
Subject: RE: TxDOT Internet E-Mail.

Good evening Mr. Clapper,

Please send me the letter and we'll review and provide you a response.

Thank you,

Omar

Omar Madrid, P.E.
Director of Maintenance
TxDOT El Paso District
915-790-4331

From: Jennifer Wright [redacted]
Sent: Wednesday, March 26, 2025 4:53 PM
To: [redacted]
Cc: Omar Madrid [redacted]
Subject: FW: TxDOT Internet E-Mail.

HI Mr. Clapper.
Thanks for reaching out to TxDOT. I have copied Omar Madrid, who can help you. Have a great day.

Thank You, and Safe Travels,
Jennifer Wright
[redacted]
915-790-4340
915-201-9414

From: NoReply [redacted]
To: Lauren Macias-Cervantes <[redacted] Jennifer Wright [redacted]
Subject: TxDOT Internet E-Mail.

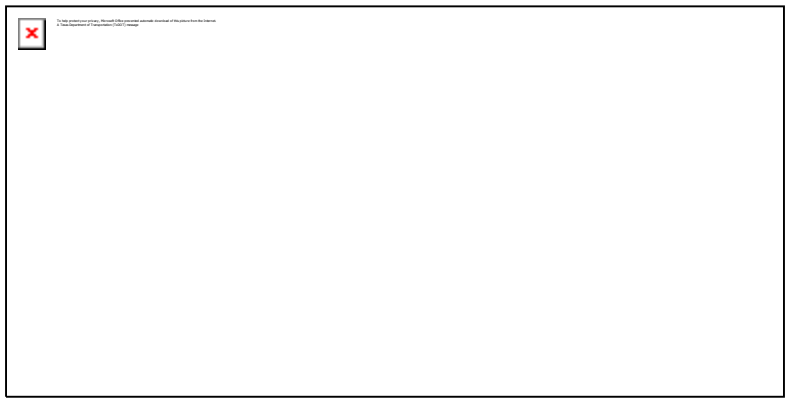
Name : Eric Clapper
Email : [redacted]
Phone : 262-751-5420
Requested Contact Method : Email
Reason for Contact : Customer Service
Comment : Hi,

I'm hoping to get in touch with Tomas Trevino. I am working on a permit amendment application for the Greater El Paso Landfill. The previous project manager for this project from Burns & McDonnell, Jack Simmons, previously sent him a letter on October 31, 2024 regarding the application. As part of the application process, we need to document TXDOT's response. Jack is no longer with Burns & McDonnell, so I am following up.

Please let me know if it would be helpful to re-send the letter we sent on October 31.

Thank you,

Eric Clapper
Environmental Engineer
Burns & McDonnell
4225 Executive Drive, Suite 400, La Jolla, CA 92037
M +1 262-751-5420
E[redacted]



Please replace Appendix I-II.H with the following pages

APPENDIX I-II.H – LOCATION RESTRICTIONS

May 8, 2025

U.S. Fish & Wildlife Service
Christina Williams
Austin Ecological Services Field Office
1505 Ferguson Lane
Austin, TX 78754

Re: Previously Approved by the TCEQ, Existing Type I Landfill Permit Amendment Application for a Solid Waste Landfill Facility Coordination
Greater El Paso Landfill, El Paso, El Paso County, Texas

Dear Christina Williams:

On behalf of our client, the City of El Paso, Texas (City), Burns & McDonnell Engineering Company, Inc. would like to take this opportunity to inform you that we are preparing a permit application for the Texas Commission of Environmental Quality (TCEQ) for a major amendment for the existing Municipal Solid Waste (MSW) Landfill Facility, the Greater El Paso Landfill, pending MSW Permit Number 2284A (Landfill). The Landfill is located approximately 1.25 miles west of the intersection of Interstate Highway 10 and Darrington Road at the address of 2600 Darrington Road, Clint, TX 79928. The Landfill is located in El Paso County just outside the El Paso (City) city limits and serves the waste needs of the City and the surrounding area. The permit application is proposing a vertical expansion on the existing Landfill footprint to provide additional capacity. The primary use for this facility will remain dedicated for disposal of MSW.

Letters dated February 8, 1999, and February 26,1999 documenting correspondence between a previous consultant for the City and the United States Fish and Wildlife Service (USFWS) and documentation of a survey of biotic resources of the Landfill (June 1999) have been included in Appendix I/II.H. According to the survey results, no endangered or threatened species were found on the subject site.

We are requesting information regarding any federally listed threatened or endangered species or their critical habitat within range of the project site. This information is required by Texas Administrative Code Chapter 330 (30 TAC § 330.61(n)).

Please send this information to me electronically to [redacted] Any comments or concurrence will be included as a supplement to the application.

Thank you for your time and assistance. If you have any questions or need any [redacted]

Sincerely,

Burns & McDonnell Engineering Company, Inc.

Eric Clapper
Environmental Engineer

cc: Tonya Koller, Burns & McDonnell
Nicholas Ybarra, City of El Paso
Cristian Benitez, City of El Paso

Clapper, Eric

From: Williams, Christina [redacted]
Sent: Friday, May 9, 2025 6:36 AM
To: Clapper, Eric
Subject: RE: [EXTERNAL] Greater El Paso Landfill

Great, we just recommend you and the contractors keep this with their records in case of inquiry.

Thank you,

Christina

Christina Williams
Supervisory Fish and Wildlife Biologist
Consultation and HCPs Branch
1505 Ferguson Lane
Austin, Texas 78754
512-850-0980

Mission: Work with others to conserve, protect, and enhance fish, wildlife, and plants and their habitats for the continuing benefit of the American people.

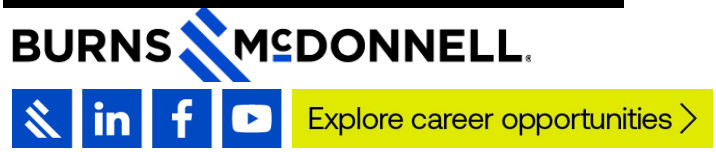
From: Clapper, Eric [redacted]
Sent: Thursday, May 8, 2025 4:37 PM
To: Williams, Christina [redacted]
Subject: RE: [EXTERNAL] Greater El Paso Landfill

Hi Christina,

Thanks for the quick response. We have already run an IPaC report for this project that I have attached and we have included it in the permit application. Also in the attachment is a memo summarizing the results. There are no federal agencies involved with this project.

Thanks,

Eric Clapper
Environmental Engineer
Burns & McDonnell
4225 Executive Drive, Suite 400, La Jolla, CA 92037
[redacted]



From: Williams, Christina [redacted]
Sent: Thursday, May 8, 2025 11:51 AM
To: Clapper, Eric [redacted]

Eric,

That was interesting seeing how we used to handle species requests! Fortunately, we are way ahead of that now. We recommend you first run your project through our Information for Planning and Consultation (IPaC) program. This program will provide a list of possible species of concern in the project area. Then we recommend reviewing details about each of the species in the list provided, which you can access via our species pages: https://www.fws.gov/program/endangered-species to determine if the species may actually be in the area.

Once you've gone through that step, you will then need to determine if the activities for the project will/could impact any listed species. You should make one of the following determinations for each species:

- A determination of "no effect" indicates the species is not in the area or will not be impacted in any way by implementation of the project. Note that we do not consult or concur on determinations of "no effect." We ask that you keep the documentation as part of your records in case of inquiry.
- A determination of "may affect, not likely to adversely affect" indicates that there will be effects (this connection/link must be made, not just presumed in an effort to get a concurrence letter). This determination must show the effects on listed species are discountable (extremely unlikely to occur), insignificant (so small they cannot be meaningfully measured, detected, or evaluated), or wholly beneficial (all effects benefit the species and/or critical habitat). The discountable and insignificant thresholds are usually reached through avoidance and minimization measures implemented as part of the project.
- A determination of "may affect, likely to adversely affect" indicates that take of a listed species is likely to result from the project and a formal consultation should be requested by the Federal Action Agency along with submission of a Biological Evaluation/Assessment.

If a Federal agency is to fund or permit all or part of the project, the project may affect any listed species, and impacts cannot be avoided, then the Federal agency must consult with our office pursuant to section 7 of the Act. If no Federal agency is involved, you may choose to get a section 10(a)(1)(B) permit (also referred to as a Habitat Conservation Plan), if take of listed species is expected to occur, as a result of the proposed project. Take, as defined by the Act, means "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct." Take is further defined to include "significant habitat modification where it actually kills or injures wildlife by significantly interfering with essential behavioral patterns such as breeding, feeding and sheltering" (50 Code of Federal Regulations 17.3).

Please let us know if you have any concerns with your project with regard to listed species.

Thank you,

Christina

Christina Williams
Supervisory Fish and Wildlife Biologist
Consultation and HCPs Branch
1505 Ferguson Lane
Austin, Texas 78754
512-850-0980

Mission: Work with others to conserve, protect, and enhance fish, wildlife, and plants and their habitats for the continuing benefit of the American people.

From: Clapper, Eric [redacted]
Sent: Thursday, May 8, 2025 12:48 PM
To: Williams, Christina [redacted]
Subject: [EXTERNAL] Greater El Paso Landfill

Hi Christina,

I received your contact information from Michael Warriner. I am working on a permit amendment application for the Greater El Paso Landfill. As part of the application process, we need to document correspondence with the FWS. I'm attaching a letter with additional information for your review.

Please let me know of any questions.

Thanks,

Eric Clapper
Environmental Engineer
[redacted]400, La Jolla, CA 92037
BURNS McDONNELL
Explore career opportunities
Please consider the environment before printing this email.

Memorandum

Date	May 8, 2025
To	TCEQ
From	Eric Clapper
Subject	Greater El Paso Landfill, MSW Auth No. 2284A

This memorandum provides the determinations of the effect on each species identified in the Information for Planning and Construction (IPaC) report that was run at the site of the Greater El Paso Landfill. The IPaC report is provided as an attachment to this memorandum. The table below summarizes the results of the IPaC report on each species, the determination of effect on each species based on the scope of the project, and the associated reasoning.

Species	IPaC Results	Determination	Reasoning
Tricolored Bat	No critical habitat has been designated.	No effect.	Species will not be impacted by implementation of the project.
Mexican Spotted Owl	Location does not overlap the critical habitat.	No effect.	Species will not be impacted by implementation of the project.
Northern Aplomado Falcon	No critical habitat has been designated.	No effect.	Species will not be impacted by implementation of the project.
Piping Plover	Only needs to be considered for wind energy projects.	No effect.	Species will not be impacted by implementation of the project.
Red Knot	Only needs to be considered for wind energy projects.	No effect.	Species will not be impacted by implementation of the project.
Southwestern Willow Flycatcher	Location does not overlap the critical habitat.	No effect.	Species will not be impacted by implementation of the project.
Yellow-billed Cuckoo	Location does not overlap the critical habitat.	No effect.	Species will not be impacted by implementation of the project.
Monarch Butterfly	No critical habitat has been designated.	No effect.	Species will not be impacted by implementation of the project.
Sneed Pincushion Cactus	No critical habitat has been designated.	No effect.	Species will not be impacted by implementation of the project.

EGC

Attachment: IPaC Resource List

May 5, 2025

Texas Department of Parks and Wildlife
4200 Smith School Rd.
Austin, TX 78744

Re: Previously Approved by the TCEQ, Existing Type I Landfill Permit Amendment Application for a Solid Waste Landfill Facility Coordination
Greater El Paso Landfill, El Paso, El Paso County, Texas

Dear Wildlife Inspector:

On behalf of our client, the City of El Paso, Texas (City), Burns & McDonnell Engineering Company, Inc. would like to take this opportunity to inform you that we are preparing a permit application for the Texas Commission of Environmental Quality (TCEQ) for a major amendment for the existing Municipal Solid Waste (MSW) Landfill Facility, the Greater El Paso Landfill, pending MSW Permit Number 2284A (Landfill). The Landfill is located approximately 1.25 miles west of the intersection of Interstate Highway 10 and Darrington Road at the address of 2600 Darrington Road, Clint, TX 79928. The Landfill is located in El Paso County just outside the El Paso (City) city limits and serves the waste needs of the City and the surrounding area. The permit application is proposing a vertical expansion on the existing Landfill footprint to provide additional capacity. The primary use for this facility will remain dedicated for disposal of MSW.

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We are requesting information regarding any federally listed threatened or endangered species or their critical habitat within range of the project site. This information is required by Texas Administrative Code Chapter 330 (30 TAC § 330.61(n)).

Please send this information to me electronically to [redacted] Any comments or concurrence will be included as a supplement to the application.

Thank you for your time and assistance. If you have any questions or need any additional information, please contact me at 262-751-5420 or eclapper@burnsmcd.com.

Sincerely,

Burns & McDonnell Engineering Company, Inc.

Eric Clapper
Environmental Engineer

cc: Tonya Koller, Burns & McDonnell
Nicholas Ybarra, City of El Paso
Cristian Benitez, City of El Paso